

We are committed to respecting your privacy. This privacy notice is to explain how we may use personal information we collect and use before, during and after the period during which we have carried out work in respect of your property. This notice explains how we comply with the law on data protection and what your rights are.

This notice applies to individuals who are looking for a property, making arrangements to move into a property, occupy or own a property, in each case which has either been constructed, refurbished, altered or maintained by or for us. This notice also applies to individuals who work for an organisation which is doing the same things. This notice does not form part of any contract relating to the property you may agree to rent or which you occupy or any contract the organisation you work for has.

References to we, our or us in this privacy notice are to the United Living Group (being United Living Group Limited, and each of its direct and indirect subsidiaries, trading under the "United Living" brand). Details of our main trading entities are as follows:

United Living (North) Limited is a limited company incorporated in England and Wales. Registered Number: 00545646  
Registered Office: Media House, Azalea Drive, Swanley, Kent BR8 8HU.

United Living (South) Limited is a limited company incorporated in England and Wales. Registered Number: 00817560.  
Registered Office: Media House, Azalea Drive, Swanley, Kent BR8 8HU.

Our Data Protection Officer (DPO) has overall responsibility for data protection compliance in our organisation. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

For the purposes of this privacy notice the controller is the relevant part of the United Living Group which is or has carried out work in your property and which is processing your personal information.

## 1. PERSONAL INFORMATION

When you interact with us in relation to the works to your property or a property transaction, you may provide us with or we may obtain personal information about you, such as information regarding:

- personal and work contact details and identifiers such as title, name, addresses, telephone numbers, and email addresses, emergency contact details, family members, referees, date of birth, gender, details of availability;
- any family members or individuals who live with you or care for you, people looking after your affairs;
- status of your current property; and where we carry out work for people that own their own home and they pay for those works, bank account information;
- details of your property (including condition surveys (photographic or otherwise)), any options selected, payments we make to you/receive from you and other associated information, relevant utilities records, decisions made by you;
- where a subject access request is made and we need to confirm your identity, identification documents and information such as passport, utilities bills, identity cards, signature, etc.;
- advisors appointed by you including lawyers and surveyors;
- enquiries, complaints and correspondence and other communications with you including SMS, MMS and other electronic communication;
- videos, photographs and audio recordings which you or other people take and provide to us or we take ourselves either of you or your home; and
- pictures where you/your home feature in our marketing materials.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION AND CRIMINAL RECORDS INFORMATION

We may collect, store and use any of the following “special categories” of more sensitive personal information regarding you:

- information about your race or ethnicity and religious beliefs; and
- information about your health, including any medical condition, health and sickness records, medical records and health professional information and disability information.

If we do collect any special category personal information, we do not currently rely on consent as a basis for processing special category personal information.

We will also not collect, store and use any criminal records information in relation to you. If we do collect any criminal records information, we do not currently rely on consent as a basis for processing criminal records information.

3. WHERE WE COLLECT YOUR INFORMATION

We will collect personal information from a number of sources. These include the following:

- Directly from you: from yourself, when you indicate that you wish to obtain information, attend our events, complete forms we provide to you, use our website/other social media platforms, enter our competitions and promotions, make a claim, make a complaint, contact us by phone, email or communicate with us directly in some other way;
- Third parties authorised by you; your landlord, housebuilder from whom you acquired your property, a family member, carer or someone else authorised by you;
- Our website: provides us with information about how you use it and the devices that you use to connect to our website;
- Providers of information: which may include local authorities, Land Registry and other web platforms;
- Journalists or other investigators: they may provide us with details or make enquires about you or matters concerning you or ourselves;
- Your professional advisors: such as lawyers and surveyors; and
- Our professional advisors: such as lawyers, accountants, consultants and surveyors.

We may also collect additional personal information throughout the period of carrying out work to your property or as connected to your dealings and activities with us.

If you are providing us with details of family members, carers and emergency contacts they have a right to know and to be aware of personal information we hold about them, how we collect it, and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

4. USES MADE OF YOUR PERSONAL INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this. Not all of these may apply to you depending upon whether we are only carrying out works at your property or whether we are involved in a property transaction.

<i>Purpose</i>	<i>Personal information used</i>	<i>Lawful basis</i>
Carrying out any identity checks	Name, personal contact details and other identifiers, and identification documents	We have a legal obligation to do so

Dealing with and managing the exchange of contracts and completion of a property transaction	All the personal information we collect	We need this information to be able to enter into, manage and perform our contract with you
Dealing with and carrying out any options selected by you in relation to the property	Personal contact details, property details, options selected	This is necessary to enter into and perform the contract with you or which has been sub-contracted to us regarding any options selected by you in relation to your property
Administering the contract we have entered into with you or which we have contracted to carry out works to your property and managing our relationship with you including your rights in relation to the property	All the personal information we collect about you	To be able to manage and perform our contract with you or which has been contracted to us regarding works to your property  To comply with our legal obligation or to establish, defend or bring legal claims
Managing our business and internal reporting	All the personal information we collect about you	We have a legitimate interest to ensure that we operate efficiently and manage our business properly  To be able to manage and perform our contract with you or which has been contracted to us regarding works to your property  To comply with our legal obligation or to establish, defend or bring legal claims
Dealing with enquiries, defect rectification, claims, complaints and other communications from you and dealing with legal disputes and claims involving you	All the personal information we collect about you	We have a legitimate interest to ensure that we operate efficiently and deal with any enquiries, complaints or other communications  We have a legitimate interest to ensure that all legal claims are managed effectively  To comply with our legal obligations and to establish, defend or bring legal claims  To be able to manage and perform our contract with you or which has been contracted to us regarding works to your property
Providing to you website access and for the purposes of ensuring the security of our systems and	All the personal information we collect about you excluding the	We have a legitimate business in ensuring our premises and systems are secure

our information including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution	special category of data referred to in section 2	To be able to manage and perform our contract with you or which has been contracted to us regarding works to your property
To conduct data analytics studies	Our customer records	We have a legitimate interest in order to improve as a company
For the purpose of complying with any legal requirements	All the personal information we collect about you	We may have a legal obligation to comply with legal requirements and we have a legitimate interest in complying with legal requirements and to establish, bring or defend legal claims
To publicise our projects in print, on our website or on social media platforms	Your comments in response to forms; and photos and/or videos	We have a legitimate interest in publicising our projects
Storage of records relating to you and also records relating to our business	All the personal information we collect about you	To be able to manage and fulfil our contract with you or which has been contracted to us, we may have a legal obligation to do so  We also have a legitimate interest to keep proper records and to establish, defend or bring legal claims

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to carry out works to your property or we may not be able to properly perform our contract with you or our contract with your landlord/house builder or comply with legal obligations.

You should be aware that it is not a condition of any contract with us that you agree to any request for consent from us and we do not usually rely on consent as a basis for processing your personal information. However if we have asked you for consent, and you have given us your consent to use your personal information, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to carry out certain activities. Currently we do not rely on consent as a basis for processing any of your personal information.

## 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- Companies in the same group of companies as us: for the purpose of providing a service to you;
- Any party approved by you: for example legal advisors, your family, carer or the organisation you work for;
- Your landlord or housebuilder;

- Other service providers to our business and advisors: sub-contractors, suppliers, out of hours service providers, security companies, public relations agencies, banks, professional advisors including legal advisors and insurers and agents, administration and IT services. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information;
- Guarantee providers: such as guarantee or warranty providers in relation to your property and/or the fixtures and fittings in the property;
- Where a property is new build, utility providers and council tax authorities: for example water, electric, gas, telephone, internet/broadband and the relevant council tax authority;
- Purchasers of our business: buyers or perspective buyers to whom we sell or negotiate to sell our business;
- The Government, government bodies or our regulators: where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC or the Information Commissioner's Office;
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security;

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell your data or market to you.

## 6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect about you is not transferred to or stored in countries outside of the UK or European Union except as set out in this section.

Our staff and other individuals working for us may in limited circumstances access personal information outside of the UK and European Union if they are on holiday abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and the same legal protections that would apply to accessing personal data within the UK.

In limited circumstances the people to whom we may disclose personal information as mentioned in the section "Disclosure of your personal information" above may be located outside of the UK and European Union. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above then please contact us using the details in the "Contacting us" section below.

## 7. HOW LONG WE KEEP PERSONAL INFORMATION FOR

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long term basis e.g. personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records as set out below:

- Legal files relating to the works carried out on your property will be retained for approximately 15 years after the end of the project.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change address or change your phone number or email address. To update us contact our Administrator or your Resident Liaison Officer / Tenant Liaison Officer / Site Manager.

## 8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;

- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example we do not use automated decision making in relation to your personal data. However some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the Information Commissioner's Office. We are here to help and encourage you to contact us to resolve your complaint first.

#### 9. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of the page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

#### 10. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email [dataprotection@unitedliving.co.uk](mailto:dataprotection@unitedliving.co.uk) or write to us at Data Protection Officer, United Living Group, Media House, Azalea Drive, Swanley BR8 8HU.