

Privacy Policy

North Property Group Ltd is a limited company registered in England and Wales: number 10761978 Registered Office: One, Brewery Wharf, Leeds, England, LS10 1GX

This privacy policy sets out how North Property Group uses and protects the personal information which you provide to us when you use this website. This privacy policy also applies when you provide us with your personal information by any other means. This privacy statement aims to give you a clear view of how we use the personal information that you provide, how we protect your data, your rights, and the options you have to control your personal information and protect your privacy. It also outlines what personal information we collect about you when you visit our websites and offices and how we use your personal information and the third parties we will share it with.

Personal information is any information which can identify you as a living individual, whether by itself or when used in conjunction with other information which we hold or are likely to hold. To this end, we have a Data Protection Officer and internal policies which relate to the protection of personal information. In addition, we regularly train our staff on data protection compliance.

Your Rights

You have the right to ask us not to process your personal data for marketing purposes. 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. You can exercise your right to prevent such processing by telling us, when registering your details that you do not want us to share your data. You can also exercise the right at any time by contacting hello@northpropertygroup.co.uk . Our site may, from time to time, contain links to and from the websites of our partner networks, collaborators and affiliates. If you follow a link to any of these websites, please note that these websites may 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.

Updates to Privacy Policy

We may change this privacy policy from time to time by updating this page. You should review this page regularly. Your continued use of this website after changes have been made to this privacy policy will be taken to indicate that you have read and accepted any changes. You should not use this website if you are not happy with any changes to this privacy policy and you should tell us if those changes mean that you are no longer happy with the way in which we use your personal information.



What information do we collect and process?

Personal information is any information that relates to you and identifies you personally. We may collect and process information that you provide by filling in forms on our website: www.northpropertygroup.co.uk or by you contacting our office and giving personal information, name, email address and telephone numbers.

You consent to any information concerning you which we collect and process being used, stored and processed in accordance with this Privacy Policy.

Information we may collect from you

- > Your name and business and/or personal contact details (including email address, postal address, telephone numbers (mobile and fixed line) information regarding what services you require from us products and/or services.
- > Information regarding your experiences with our products and/or services.
 - Your direct marketing contact preferences and consents (please refer to the section "Direct Marketing" below for more information).
- > (If you are a residential customer) credit/debit card details and bank account details for the purpose of setting up direct debits;
- > (If you are a business customer, i.e. if you are acting on behalf of a company, partnership or sole trader) bank account details for the purpose of setting up direct debits and information about business operations, which may include some personal information; and
- > information you provide in any "free text" boxes on this website (i.e. blank spaces where you are free to insert comments).
- > This list is not exhaustive, and it may be updated in the future. It is a fair reflection of some of the personal information about you which we collect through this website (and which is provided to us by other means).

What is sensitive data?

This is a more sensitive category of personal information which relates to (e.g.) a person's race, sexual orientation, criminal allegations or offences, financial status, trade union membership or their mental or physical health.

We do not actively collect sensitive personal data from our customers. However, it would be relevant to the extent that you choose to send this type of information to us, for example if you submit a query to us through the website which refers to the requirements you have for a residential property, based on the condition of your health or any disability.



We make sure that sensitive personal data is subject to additional controls. We would use it only to deliver our services to you, to meet your requirements or to deal with any requests made by you. We would only disclose it to any of the third parties referred to in the section "Who do we share your personal information with?" in the event that they need to know it (eg if a third party service provider is making adjustments to a property in accordance with the information you have provided to us) and subject to appropriate confidentiality obligations (as may be appropriate).

How we use your personal information

The legitimate purposes for which we use your personal information may include use for the following purposes:

- 1. When you enquire or register for products and services provided by North Property Group you will provide us with certain personal information. This information may be provided online through our websites, by telephone, by electronic communications or via direct contact with our employees. This information will be stored on our computer systems and in our manual records.
- 2. The information that you provide will allow us to process your registration, confirm your identity and communicate with you to provide relevant products and services to suit your needs. The relevant information is then used by us, our agents and sub-contractors to communicate with you on any matter relating to your relationship with North Property Group in general. Your information may also be transferred or forwarded to other members of North Property Group or its group for administration, marketing or information gathering and similar purposes.
- 3. In order to comply with Money Laundering Regulations 2017, we will request personal data and documents from vendors and purchasers to confirm identity and address and, in the case of a purchase, will request evidence of funding and the source of any funds being used.
- 4. Some of the services provided by North Property Group may be supplied by third parties and therefore we will pass on to the relevant party the information they require to fulfil your needs. In accordance with the Act, we will impose restrictions and standards in our written contracts with service providers to ensure they keep your personal information secure and use it only for the purposes for which it was provided to them.
- 5. To carry out internal record keeping and audits.
- **6**. To administer this website and our contract or other relationship with you, including in order to provide our products and/or services to you (for example, to put you in touch with estate agents and other appropriate third parties (meaning any other person or organisation) in accordance with your instructions).



- 7. To obtain payments from you for our products and/or services (this is why we collect credit/debit card details and bank account details).
- 8. To analyse the way in which you use this website with a view to improving the products and/or services we offer and our marketing and advertising activities and for market research purposes related to improving the same including online surveys (we may contact you ourselves for this purpose or ask third parties to do so on our behalf please refer to the section "Who do we share this information with?" below);
- 9. To analyse patterns and trends of use and the uptake of our products and/or services;
- 10. To process job applications which you submit to us through this website;
- 11. To send you direct marketing information about the products and/or services of North Property Group, its subsidiaries and of companies carefully selected by North Property Group (but only when you provide the appropriate consents to permit this please refer to the section "Direct Marketing" below); and
- 12. To comply with our legal, regulatory and other good governance obligations.

This list is not exhaustive, and it may be updated in the future. It is a fair reflection of some of the current purposes for which we may use the personal information about you which we collect through this website (and which is provided to us by other means).

Who we share your information with?

Except as otherwise set out in this section, we will not transfer, disclose, sell, distribute, or lease your personal information to third parties unless we have your permission or are permitted or required to do so by law or legal process.

We engage third-party service providers to perform a variety of business operations on our behalf. In so doing, we may share your personal information with them. We provide our service providers with only the personal information they need to perform the services we request, and we contractually require that they protect this information appropriately and not use it for any other purpose.

- > Fulfil your service requests and answer your questions.
- > Host our sites and deliver our email or other communications.
- > Analyse our data, sometimes combined with data from other sources, to send you communications.
- > Conduct research and analyse data to improve our products, services, and sites.
- > Perform other services that we request.



Where permitted by law, we combine personal information about you that North Property Invest, North Property Sales, North Property Lettings and North Property Group Manchester has collected with personal information about you that a business partner has collected so we can jointly send tailored promotional communications to you. In such instances, our business partner will not be permitted to use this other data or the combined data for its own, independent marketing purposes. Our service provider will only be allowed to use the combined set of information to send you joint communications that we hope will be of interest to you. If you prefer not to receive these joint communications, you can always opt out by following the instructions provided in any such communication or through this Privacy Statement as indicated above.

Third party companies may consist of the following:

- 1. EPC companies (energy performance certificates) to be carried out at your property.
- 2. Damp companies/ electrical contractors/ locksmiths/ builders/ plumbers/ alarm engineers etc.
- 3. Local council (on demand)
- 4. Utility Providers
- 5. Insurance Providers
- 6. Police and other legal entities

The above list is not exhaustive.

Other situations when we may share information

We may transfer or otherwise process your personal information:

- > As part of the sale of a brand to another company.
- > To protect, defend or exercise the rights and property of North Property Group (including enforcing our Terms and Conditions).
- > When required by law and/or government authorities.

International transfer of data

We may share your personal information with our service providers, and this may involve transferring it to countries outside Europe whose data protection laws may not be as extensive as those which apply to us. At this time, we do not envisage any such transfers but if we do transfer your personal information to a country outside Europe, we will ensure that we do this in accordance with the Act (for example, by putting in place an appropriate data transfer agreement).



We will do this with a view to ensuring that the level of protection which applies to your personal information processed in these countries is similar to that which applies within Europe.

What if you are using this website from outside the UK?

If you are using this website from outside the UK, other laws may apply to the processing of your personal information. We operate this website from within the UK. We are not subject to your country's local laws and this privacy policy may not be compliant with those laws. You should not submit your personal information to us unless you are happy with this position.

What about anonymised information?

Occasionally we may use and disclose information in aggregate (ie so that individual customers cannot be identified) for particular purposes such as marketing and strategic development purposes. This would not constitute your personal information because you would not be identified or identifiable from it. This means that neither this privacy policy nor the Act would apply to that information.

How we protect your personal information

To prevent unauthorised access or disclosure, damage or loss to/of (as appropriate) your personal information, we implement suitable physical and electronic, organisational and technical security measures in accordance with our obligations under the Act. This may include encryption (for example, credit/debit card details are encrypted on the North Property Group IT system).

Despite our efforts regarding security, it is important to bear in mind that the internet is not a secure means of communication. Personal information communicated through the internet may be intercepted by other people. We cannot guarantee the security of personal information sent to us through this website. You accept that you use this website at your own risk.

Information about children

This website is not intended for use by minors under the age of 13. Minors under the age of 13 should not submit any personal information to us through this website. Parents and guardians should remind their children to handle their personal information securely and responsibly on the internet.

Linking

This website does contain links to other websites. In addition, other websites outside our control may link to this website. North Property Group is not responsible for the privacy practices and contents of such other websites. You should exercise caution and look at the privacy policy on the website in question.



Cookies and web beacons

We may use "cookies" on our website. Cookies are data files which store information on your hard drive or browser that means that our website can recognise that you have visited our website before. They make it easier for you to maintain your preferences on this website, and by seeing how you use the website, we can tailor it to your preferences and measure your use of it.

You can, should you choose, disable the cookies from your browser and delete all cookies currently stored on your computer. On Microsoft Internet Explorer, this can be done by selecting 'Tools/Internet Options' and reviewing your privacy settings or selecting 'delete cookies'. You can find out how to do this for your particular browser by clicking 'help' on your browser's menu or by visiting http://www.allaboutcookies.org/manage-cookies/index.html. However, many of our website features will not function if you disable cookies.

We may also use electronic images known as "web beacons" on this website and in communications generated from using and/or registering on this website, such as promotional emails. Web-beacons usually work in conjunction with cookies and they are used for similar purposes.

Accuracy of data and processing of data

Updating and obtaining access to or copies of your personal information:

If any of your personal information which we hold becomes out of date or inaccurate, please let us know by contacting us by email or by post using the contact details in the section "How to contact us" below. You would need to put your request in writing. We will amend your personal information if we believe it contains factual errors or is out of date.

The act gives you the right to access information held about you. Your right to access can be exercised in accordance with the Act. In some circumstances we may provide access and not copies. We may charge of £10.00 to cover some of our administration costs in responding to your request. We are permitted to do this under the Act.

Direct marketing and third party "fair processing notices" and consents

North Property Group and third party companies carefully selected by North Property Group because they offer products and/or services which we believe may be of interest to you, may wish to contact you by post, telephone, fax, email, SMS and other electronic methods of marketing which may become relevant in the future in order to provide you with marketing information about the products and/or services and/or special offers of North Property Group and our carefully selected companies.



To this end, we may collect personal information from you for direct marketing purposes through this website or by other means such as through paper forms issued to you, email exchanges with you, meetings with you and telephone conversations with you.

We will make it clear on the relevant pages of this website if personal information which we collect may be used for direct marketing purposes. We will do the same should we collect your personal information by other means for this purpose. At the same time we will seek your consent to receive direct marketing or we will permit you to opt-out of receiving this (depending on what is required under applicable laws).

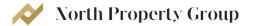
We will ensure that any direct marketing sent by electronic means would provide you with a simple way to refuse further electronic marketing. For example, SMS messages may tell you to text 'STOP' to a telephone number and emails may tell you to send a request to an email address to stop further emails. Should you refuse further electronic marketing, as soon reasonably possible it would be noted that you had changed your mind. This means that your personal information (including your contact details) may still be held in a repressed form but only to ensure that we maintain a record telling us not to contact you for the same direct marketing purposes.

If at any other time you wish to change your mind about receiving direct marketing from us, please contact us by email or post using the details in the section "How to contact us" below.

In addition, third parties such as estate agents, letting agents, lenders, banks, residential developers, companies operating other websites and receivers acting for banks and lenders may collect personal information from you for direct marketing purposes. We may obtain your personal information from those third parties with the intention of using it to send you direct marketing about our products and/or services (or those of our parent company). We take steps to ensure that we do this only when you provide the appropriate consents to those third parties to permit this.

We are not responsible for the privacy practices of third parties. They should provide you with their own "fair processing notice" (for example, a website privacy policy) when they collect your personal information. It should identify them as Data Controller; provide a valid contact address and give you fair notice that they will pass on your personal information to other companies such as North Property Group for particular purposes including direct marketing purposes. In addition, as explained above, we take steps to ensure that those third parties collect appropriate consents to permit your personal information to be used by us for direct marketing purposes.

Having obtained your personal information from a third party we would issue you with our own "fair processing notice" at an appropriate time (for example, by pointing you towards this website privacy policy). We would also provide you with the appropriate mechanisms to alter your direct marketing preferences (ie to change your mind about whether you wish to receive it or not) and we would record any altered preferences as soon as reasonably possible.



Retention of your personal information

In accordance with the Act we will ensure your personal information is not kept longer than necessary for the relevant purpose(s) by us or by any third parties which process it on our behalf. Where personal information which we hold is known to be unreliable, irrelevant or excessive, we will securely delete it as soon as possible.

We will keep your personal information thereafter only for as long as is necessary in case of any legal challenges or other problems. After that period your personal information will be suppressed in or deleted from our database(s).

How to contact us

Should you have any queries in respect of this statement or our use of personal data, please contact North Property Group by emailing hello@northpropertygroup.co.uk or calling our Leeds office on +44 1134 264 444