| Richmonds- Privacy Policy |
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| 1. Important information and who we are |
| Purpose of this privacy notice |
| This privacy notice aims to give you information on how Richmonds collects and processes your personal data, however you provide it to us. |
| It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them. |
| Controller |
| Richmonds is the controller and is responsible for your personal data (collectively referred to as "TPC", "we", "us" or "our" in this privacy notice). |

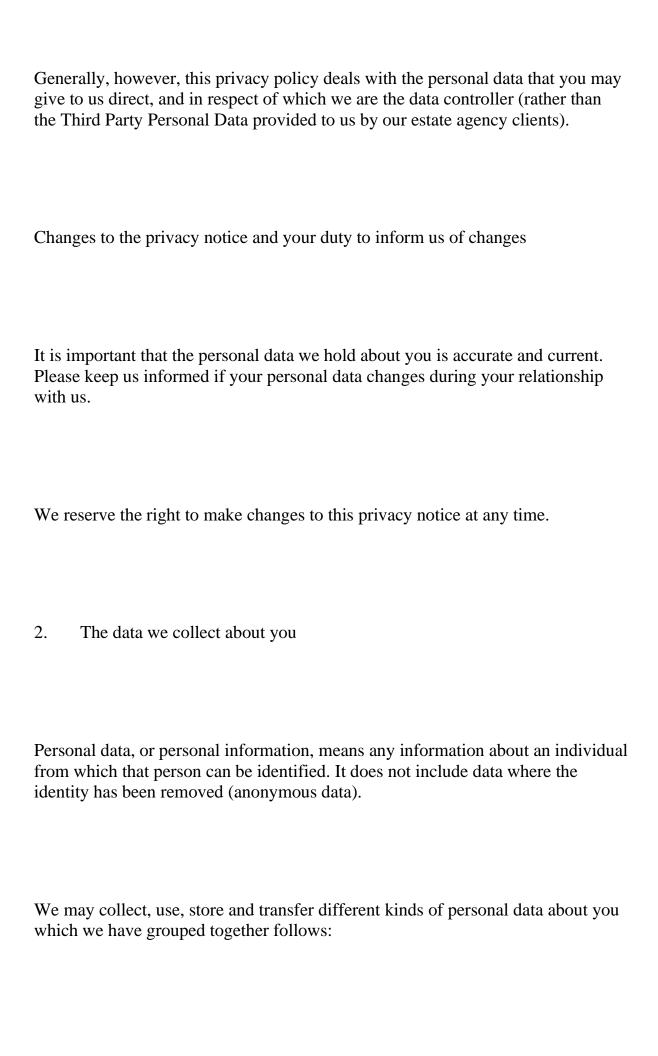
| We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below. |
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| Contact details |
| Name of data privacy manager: Claire Cook |
| Email address: claire.cook@property-collection.co.uk |
| Postal address: The Property Collection, Tinwell Business Park, Steadfold Lane, Stamford PE9 3UN |
| We also operate the website at www.property-collection.co.uk |
| You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. |

Processor

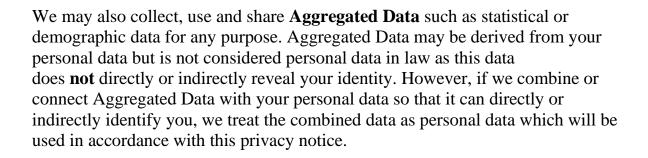
Please note that much of the personal data we process is provided to us by the estate agents to whom we provide our services/products. We process this data on the estate agent's behalf for the purpose of performing our contract with them. We use this personal data to send information, web-based tools, and other products on the estate agent's behalf to the estate agent's customers. We refer to this data as "Third Party Personal Data".

We process Third Party Personal Data as a data processor on behalf of our estate agent clients (who will be the data controller in these circumstances). Where we process Third Party Personal Data as a data processor we do so strictly in accordance with our contractual obligations to the relevant data controller (i.e. the estate agent), and in accordance with the legal requirements upon data processors. Note that the lawful basis on which we process Third Party Personal Data (for the purposes of performing our contract with the estate agent) may be different from the lawful basis on which the estate agent processes that personal data (which may be on the basis of consent, or some other basis).

Where we are acting as a data processor, we do not use or engage sub-processors of personal data, without the relevant data controller's prior authorisation. Furthermore we will, upon the relevant data controller's direction, either return to them or destroy the Third Party Personal Data we have processed on their behalf, at the end of our contractual relationship with them.



| • Identity Data includes first name, last name and title. |
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| • Contact Data includes home address, email address and telephone numbers. |
| • Financial Data includes bank account and payment card details, and details about payments to and from you. |
| • Transaction Data includes details of services/products you have purchased or otherwise received from us. |
| • Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. |
| • Marketing and Profile Data includes your preferences in receiving marketing from us and your communication preferences, your interests, feedback and survey responses. |
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We do not collect any **Special Categories of Personal Data** about you (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.

Please also note that we do not knowingly collect data relating to children.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you or to provide you with services/products you have requested, and you fail to provide that data when requested, we may not be able to perform the contract we have or to provide you with the services/products you have requested from us. In this case, we may have to cancel the contract in question that you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

| We use different methods to collect data from and about you including through: |
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| • Direct interactions. You may give us your data by corresponding with us by post, phone, email or otherwise. This includes for example personal data you provide when you complete a registration form or complete an enquiry form on our website. |
| Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources. This includes for example Technical Data from analytics providers such as Google, and Financial and Transaction Data from providers of technical, payment and other services. Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns by using cookies, and other similar technologies. |
| 4. How we use your personal data |
| We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: |
| |

| _ | contract you have | (a) Identity | Performance of a contract with you |
|---------------------|---|---|---|
| Pur | pose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
| dependi us if yo | ng on the specific pur u need details about th | pose for which we a le specific legal grou | more than one lawful ground re using your data. Please contact and we are relying on to process as been set out in the table below. |
| | | | otion of all the ways we plan to es we rely on to do so. |
| Purpose | es for which we will us | se your personal data | a · |
| • Whe | ere we need to comply | with a legal or regu | latory obligation. |
| | ere it is necessary for overests and fundamenta | _ | ets (or those of a third party) and ride those interests. |
| | ere we need to perform into with you. | n the contract we are | about to enter into or have |

| | (b) Contact | |
|---|-----------------|--|
| | (c) Transaction | |
| | (d) Technical | |
| | (e) Financial | |
| To recover costs due to | (a) Identity | Necessary for our legitimate |
| us | (b) Contact | interests (in respect of recovering monies or debts due |
| | (c) Transaction | to us) |
| | (d) Financial | |
| | | |
| To respond to enquiries | (a) Identity | Necessary for our legitimate |
| or requests from you, and communicate with you in | (b) Contact | interests (response to enquiries or requests) |
| relation to those enquiries | | or requests) |
| or requests | (c) Transaction | |
| | (d) Marketing | |
| | and Profile | |
| To manage our | (a) Identity | (a) Performance of a contract |
| relationship with you which will include | (b) Contact | with you |
| notifying you about | | (b) Necessary to comply with a |
| changes to our terms or | (c) Transaction | legal obligation |
| privacy policy, and to | (d) Marketing | (c) Necessary for our |
| enable you to give feedback or complete a | and Profile | legitimate interests (to keep |
| survey | | our records updated and the |
| | | administration and |
| | | management of our business, |
| | | and to study how customers |
| | | use our products/services, to develop them and grow our |
| | | business) |
| To administer and protect | (a) Identity | (a) Necessary for our |
| our business and our | (h) Contact | legitimate interests (for |
| website (including troubleshooting, data | (b) Contact | running our business, provision of administration and IT |
| analysis, testing, system | (c) Technical | services, network, premises |
| maintenance, support, | (a) T:: | and asset security, to prevent |
| | (e) Transaction | |

| reporting and hosting of data) | | fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a |
|--------------------------------|-----------------|--|
| | () TD 1 1 1 | legal obligation |
| To use data analytics to | (a) Technical | Necessary for our legitimate |
| improve our website, | (b) Morkoting | interests (to keep our website |
| products/services, | (b) Marketing | updated and relevant, to |
| marketing, customer | and Profile | develop our business and to |
| relationships and | | inform our marketing strategy) |
| experiences | | |
| To make suggestions and | (a) Identity | Necessary for our legitimate |
| recommendations to you | | interests (to develop our |
| about services/products | (b) Contact | products/services and grow our |
| that may be of interest to | | business) |
| you | (c) Transaction | |
| | | |
| | (d) Technical | |
| | (e) Marketing | |
| | and Profile | |

Marketing

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by <u>contacting us</u> at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data that we process and use on a different lawful basis, or in respect of which you continue to consent to us processing.

| We will not share your personal data with any third party for marketing purposes. |
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| Our Website - Cookies |
| We may use cookies on our website which collect personal data. We may publish a separate Cookie Policy on our website to provide more information about the cookies we use. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. |
| Our Website - Third-party links |
| Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit. |
| Software & System Providers including but not limited to; |

| BriefYourMarket, Reapit Software, Sage, Iam-Sold and The Property Collection |
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| Website Hosts and analytics platform providers including but limited to; |
| The Property Collection, BriefYourMarket and Google Analytics |
| Change of purpose |
| We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. |
| If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. |

| Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. |
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| 5. Disclosures of your personal data |
| We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above. |
| • Service providers who provide services to us, including; (i) IT service providers (in particular for systems maintenance and Cloud database provision); (ii) Bailiffs and debt collection agencies; and (iii) Payment processing service providers. |
| Professional advisers including bankers, lawyers, accountants and insurers who provide banking, consultancy, legal, insurance and accounting services. |
| HM Revenue & Customs and other authorities who may require reporting of processing activities in certain circumstances. |
| • Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or |

merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

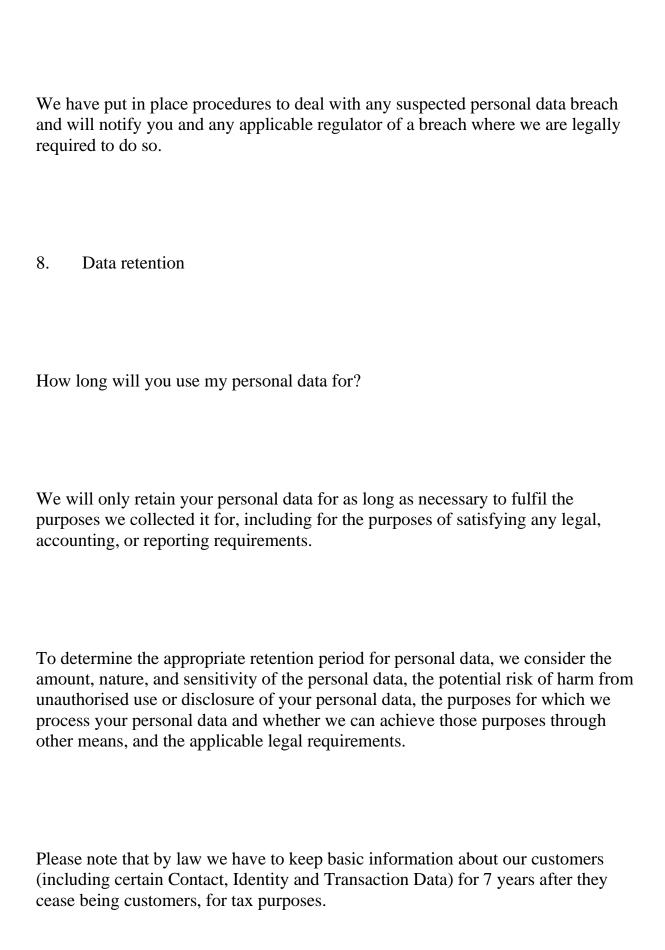
We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

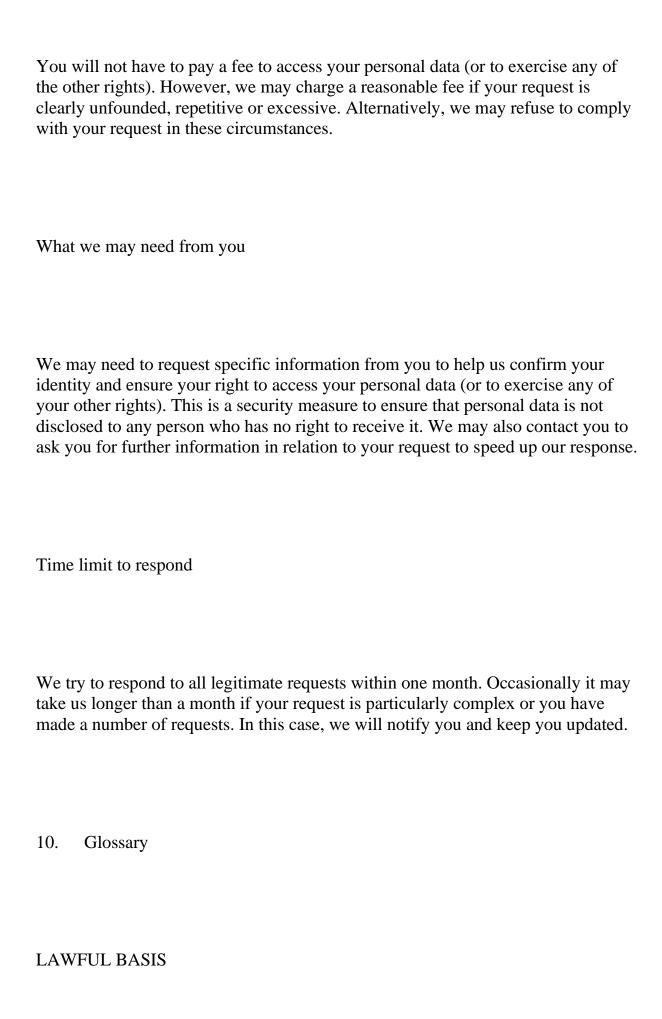
We share your personal data within the Rackspace Group (who provide cloud database services). This will involve transferring your data outside the European Economic Area (EEA) to the USA. Rackspace are part of the Privacy Shield programme, which requires them to provide similar protection to personal data shared between Europe and the US.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.



| We keep personal data relating to suppliers for longer, as it is in both our interests and theirs that they remain on our system. |
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| In some circumstances you can ask us to delete your data: see below for further information. |
| In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. |
| 9. Your legal rights |
| Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the further information towards the bottom of this privacy policy. If you wish to exercise any of these rights, please contact our data privacy manager. |
| No fee usually required |



| Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us. |
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| Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. |
| Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to. |
| YOUR LEGAL RIGHTS |
| You have the right to: |

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal

claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.