

# PRIVACY POLICY

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# 1.1 Who we are

We are Pegasus Homes, a passionate team of people with a wealth of experience in creating quality homes, based in England. All references in this policy to "Pegasus Homes", "our", "us" or "we" refer to:

Company Name	Company Number
Pegasus Homes Limited	08221003
Pegasus Homes Customer Operations Limited	08481940
Pegasus Homes Lettings Limited	13947991
Pegasus Homes Agency Services Limited	10634657

The registered office for all companies is 105-107 Bath Road, Cheltenham, Gloucestershire GL53 7PR.

If you require any additional information relating to the Pegasus Homes Limited, including any subsidiary or group affiliate company, or are not sure which Pegasus Homes company is responsible for your personal data at any time, please contact us at <u>dataprotection@pegasushomes.co.uk</u>.

All references in this policy to "our website", is a reference to the website owned by and operated by Pegasus Homes Limited at <u>www.pegasushomes.co.uk</u>.

### 1.2 Our values and what this policy is for

We value your privacy and want to be accountable and fair as well as transparent in the way that we collect and use your personal information. We also want you to know your rights in relation to your information.

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any questions or feedback on this privacy policy please email <u>dataprotection@pegasushomes.co.uk</u>.

# 1.3 Who this policy applies to

This policy applies to:

- 1. Visitors to our website;
- 2. Homeowners and tenants (including prospective homeowners and tenants), visitors to their homes, guarantors, executors, family members or representatives (where they have power of attorney or are an alternative contact), next of kin or anyone named as such;
- 3. People who contact us with enquiries; and

4. Our suppliers and their employees.

Depending on our relationship, we will collect and use your information in different ways as detailed in the sections below.

# 1.4 What this policy contains

This privacy policy describes the following important topics relating to your information:

- 1. How we obtain your personal information;
- 2. How we use your personal information and our legal basis for processing;
- 3. How and why we share your personal information;
- 4. How long we store your personal information;
- 5. Your rights;
- 6. International data transfers;
- 7. Risks and how we keep your personal information secure;
- 8. Links to other websites;
- 9. Changes to this privacy policy; and
- 10. Further questions and how to make a complaint

### 1.5 Your rights to object

You have various rights in respect of our use of your personal information. These are detailed further below, but two of the fundamental rights to be aware of are that you may:

- 1. ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- 2. ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

# 1.6 What you need to do and your confirmation to us

Please read this privacy policy carefully to understand how we handle your personal information. By engaging with us in the ways set out in this privacy policy, you confirm that you have read and understood the entirety of this privacy policy, as it applies to you.

### Section 2 - Key Information

### 2.1 How we obtain your personal information

In order to provide information and/or services to you, we collect personal information from you (or your representatives) directly, including where you:

• use the online forms provided on our website,

- complete forms for or at our properties or for our other retirement living and associated services,
- set up an account with us,
- sign-in at one of our properties,
- apply for vacancies within Pegasus Homes,
- contact us by phone, email or other means, and
- if you are a supplier, and you provide us with personal information about you when you are offering or providing information and/or services to us.

We also receive information about you from third parties such as referrers (who might be your friends or family members), marketing or sales agencies, market research companies, our suppliers, contractors and consultants at our sites, group companies, public websites and public agencies, which we refer to as "third party sources" or "suppliers" throughout this policy.

If you are a homeowner or tenant, our suppliers include:

- Tunstall Healthcare (UK) Limited ("Tunstall") who provides out of hours emergency support,
- Rendall & Rittner Limited and Vickery Holman Limited who provide property management functions,
- The Deos Property Group (trading as Adiuvo) who provide an out of hours telephone answering and emergency property management service, and maintenance contractors to ensure our obligations as a landlord and the obligations of utility companies to provide you with the services offered,
- Pegasus Homes Customer Operations Limited, who are part of the Pegasus Homes, deliver our customer operations services and property management services,
- Heat billing agents Switch2 Limited, Evinox, Murphy Young,
- Our external legal advisors and debt collection companies.

### 2.2 How we use your personal information

How and why we process your personal information depends on our relationship with you. This section of the privacy policy describes our use of your personal information:

- where you visit our website;
- where you are a homeowner or tenant (including prospective), visitors to their homes, family members, representatives (where they have power of attorney or are an alternative contact), next of kin or anyone named as such;
- where you contact us with enquiries;
- where you are our supplier; and
- additional reasons otherwise relevant to our relationship with you.

### (a) Visitors to our website

Categories of personal information we collect about you

We, or third parties on our behalf, collect and use any of the following information about you:

**Contact Data** which is your name, your postal address, your email address, your telephone number;

Health and Wellbeing Data which is information that you provide about your health

when you correspond with us about our services;

**Technical Data** which is the Internet protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform.

**Usage Data** which is information about your visit and your behaviour on our website (for example, the pages that you click on). This may include the website you visit before and after visiting our website (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), the methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads.

How we use your personal information and our lawful basis for processing

Purpose for processing	Categories of Data used	Lawful basis for processing
To allow you to access and use our website.	Technical Usage	Necessary for the performance of a contract.
To receive enquiries from you through the website about our retirement living services including our properties.	Contact Health and Wellbeing	Necessary for the performance of a contract (i.e. where necessary to respond to enquiry). Our legitimate business interest in running, growing and developing our business.
For improvement and maintenance of our website and to provide technical support for our website.	Technical Usage	Our legitimate business interest in operating and improving our website, to administer our website, to measure the efficiency of our systems and to undertake an analysis on the locations from which people access our web pages.
To ensure the security of our website.	Technical Usage	Our legitimate business interest in operating and improving our website and protecting your personal data.

To recognise you when you return to our website to store information about your preferences, and to allow us to customise the website according to your individual interests.	Technical Usage	Necessary for the performance of a contract (i.e. where necessary to remember and give effect to your preferences). Our legitimate business interest in operating and improving our website.
To evaluate your visit to our website and prepare reports or compile statistics to understand the type of people who use our website, how they use our website and to make our website more intuitive. Such details will be anonymised as far as reasonably possible and you will not be identifiable from the information collected.	Technical Usage	Our legitimate business interest in operating and improving our website.

#### Cookies

Some pages on our website use cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.

For detailed information on the cookies we use and the purposes for which we use them, please refer to our cookie policy via the link below or by contacting <u>dataprotection@pegasushomes.co.uk</u>. Cookie Policy: https://www.pegasushomes.co.uk/company/legal/cookie-policy/

(b) Homeowners and tenants (including prospective), visitors to their homes, guarantors, executors, family members or representatives (where they have power of attorney or are an alternative contact), next of kin or anyone named as such

What personal information we collect about you

We, or third parties on our behalf, collect and use any of the following information about you:

**Identity Data** which is your name, your age, date of birth, your gender, marital status, details of your character and physical description, national insurance number, ID documents such as passport or driving licence and/or proof of address.

**Contact Data** which is your postal address, your email address, your telephone number, your emergency contact information and next of kin details, other third party contact details for example your GP in case of an emergency.

**Lifestyle Data** which is the name of your spouse or civil partner, details of your pets, property details and previous house details including value, type, size, your car registration number, other information provided when you correspond with us and any updates to information provided to us, and information about the utilities you use,

details of your leisure activities and interests.

**Services Data** which is information about the retirement living and associated services we provide to you, information needed to provide the services to you (including information on joining forms, order details, order history and payment details), customer services information such as information about issues raised with us, customer relationship management and marketing information, CCTV recordings, voice recordings, information about your occupation of the premises for security purposes, information you provide to help us provide you with improved retirement living and associated services, for example if we ask you to fill in a survey or questionnaire, and information about your preferences;

**Health and Wellbeing Data** which is information about your health and wellbeing; health and safety information, including any accidents you have at one of our properties; health information to enable us to support you and others to live independently within the development;

**Financial Data** which is financial information including bank details for payment of rent, service charges and services available at each site.

How we use your personal information and our lawful basis for processing

Purpose for processing	Categories of Data Used	Lawful basis for processing
To provide you with services as a landlord, property management company, enter agreements with you for the sale or rental of a property, manage payments and collect and recover money owed to us and where you are a prospective tenant to carry out reference checks, affordability checks and to assess your ability to live independently.	Identity Contact Lifestyle Services Health and Wellbeing Financial	Necessary for the performance of a contract. Our legitimate business interest in running, growing and developing our business.
To deal with any enquiries or issues you have about our developments and associated services that you request from us including to provide support for any faults in our technology, amenities or other faults or maintenance required at our developments, or enquiries relating to financial matters such as to service charge, rent and other payments.	Identity Contact Lifestyle Services Health and Wellbeing Financial	Necessary for the performance of a contract (i.e. where necessary to respond to enquiry). Where necessary to comply with our legal obligations. Our legitimate business interest in running, growing and developing our business and the provision of property management services, and ensuring a safe environment for our residents, tenants, homeowners, staff and suppliers, and to provide customer service

To send you communications (including by email or post) about our developments and associated services such as service announcements, site newsletters, information about events and activities, correspondence relating to property management services and administrative messages (for example, setting out changes to our terms and conditions and keeping you informed about our	Identity Contact	Necessary for the performance of a contract (i.e. where the communication is relevant to the service offering). Our legitimate business interest in running our business. Where necessary to comply with our legal obligations.
fees and charges). To ensure your safety and security and that of others, including the use of CCTV and, where you are a current resident, homeowner or tenant, to assess your ability to live independently.	Identity Contact Lifestyle Services Health and Wellbeing	Our legitimate business interest in ensuring a safe environment for our residents, homeowners, tenants, visitors to their homes, staff and suppliers.
For quality assurance of our properties and associated services.	Lifestyle Services	Our legitimate business interest in running, growing and developing our business. Where necessary to comply with our legal obligations.
To carry out consultations, statistical analysis and market research on people who may be interested in our developments and associated services.	Contact Lifestyle Services Health and Wellbeing	Our legitimate business interest in running, growing and developing our business.
To contact your next of kin, health care provider, external services or emergency services in case of an emergency or material risk to or concern for your health and/or safety.	Identity Contact Health and Wellbeing	Our legitimate business interest in ensuring a safe environment for our residents, tenants, homeowners, staff and suppliers. Where necessary to protect yours or another's vital interests.
For marketing purposes; to contact you (including by email or post) with information about our	ldentity Contact	Our legitimate business interest for business development and marketing purposes.

developments and associated services which either you request, or which we feel will be of interest to you (including newsletters, invitations).	Lifestyle Services Health and Wellbeing	Or where legally required, with your consent (which you may withdraw at any time after giving it, see " <b>Your</b> <b>rights</b> " below).
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## Source of personal information

We may receive some of your personal information from third parties, such as:

- your name and contact details from your family members, for example where you are listed as a next of kin.
- your health and wellbeing from your carers and medical professionals in the case of an emergency.
- your name, contact details and information needed to provide the services to you (including information on joining forms, order details, order history and payment details from estate agents and legal providers for the purposes of providing you with our property services.
- your personal information, such as details about your property, from property maintenance providers such as Rendall & Rittner, Vickery Holman or others for the purposes of providing you with our property maintenance services.
- information about your health and wellbeing from Tunstall where you use our out of hours emergency support service.
- information about out of hours emergency property maintenance support from Adiuvo relating to the issue and progress of a repair or maintenance.
- information about your health and wellbeing from the emergency services if you have an emergency when at one of our developments.
- some of your personal information from third parties, such as marketing agencies or Experian who provide us with your name and address in order to send you marketing information through the post which we can provide upon request.
- information from lettings or estate agents through whom you have requested information about our developments.
- information about your service usage from third parties such as EV car charging companies, heat billing agents.

### Special categories of data

Some of the personal information that we collect about you or which you provide to us about you or your family members may be special categories of data. Special categories of data include information about physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical beliefs, trade union membership and biometric data. A couple of examples of where we collect and process your special category data is if you have an accident at one of our properties causing injury, or if you are a prospective customer and we need to assess your ability to live independently at one of our properties.

We process your special category data based on:

• your explicit consent;

- where necessary for health or social care purposes;
- where necessary for the establishment, exercise or defence of legal claims; or
- where necessary to protect yours or another's vital interests (e.g. in the case of an emergency).

Information we need to provide services to you

We need certain types of personal information so that we can provide services to you and perform contractual and other legal obligations that we have to you, including ensuring your wellbeing when at our properties. If you do not provide us with such personal information, or if you ask us to delete it, you may no longer be able to access our retirement living and associated services.

Our use of your family and next of kin information

Separately, we process personal information about your family and next of kin (such as their name and contact details) so that we may contact them in an emergency. We will only process your or your family/next of kin's personal information for this specific purpose or for any other purposes specifically permitted by law.

(c) Other people we engage with, such as community survey respondents and others who contact us with enquiries

What personal information we collect about you

We, or third parties on our behalf, collect and use any of the following information about you:

- **Identity Data** which is your name, your age, date of birth, marital status, your occupation, voice recordings.
- **Contact Data** which is your postal address, your email address, your telephone number.

**Lifestyle Data** which is information provided by you when you correspond with us, information provided when you complete a survey or feedback form, health & wellbeing information, any updates to information provided to us, and current property value.

How we use your personal information and our lawful basis for processing

Purpose for processing	Categories of Data Used	Lawful basis for processing
To deal with any enquiries or issues you have about our retirement living and associated services or our business, building sites and developments, including any questions you may have about how we collect, store	Identity Contact Lifestyle	Necessary for the performance of a contract or in order to take steps to enter into a contract. Our legitimate business interest for providing customer support services.

and use your personal information, or any requests made by you for a copy of the information we hold about you.		
To run community surveys to better understand local community views on our retirement living and associated services, or our business, building sites and developments.	Identity Contact Lifestyle	Our legitimate business interest in understanding the impact of our proposed developments on the local community / neighbourhood.
To send you communications (including by email or post) about our developments and associated services.	Identity Contact Lifestyle	Our legitimate business interest in running our business. Where necessary to comply with our legal obligations. Or where legally required, with your consent (which you may withdraw at any time after giving it, see " <b>Your rights</b> " below).

# (d) Our Suppliers

What personal information we collect about you

We, or third parties on our behalf, collect and use any of the following information about you:

**Identity Data** which is your name, your gender, your date of birth, proof of identification and address, visa or work permit documentation, criminal records checks (where applicable and allowed by law); CCTV recordings.

**Contact Data** which is your work contact information (phone number, postal address, mailing address, email address), your job title.

**Professional Data** which is a copy of your CV, training, pitch and tender information, personal information we collect about you from third party sources such as LinkedIn, information required to access company systems and applications (such as system ID), work hours (overtime and hours worked).

**Financial Data** which is details of compensation, expense claims and bank details, credit checks (if an individual or sole trader) and other financial information.

How we use your personal information and our lawful basis for processing

Purpose for processing	Categories of Data Used	Lawful basis for processing
To enable us to receive and	Identity	Necessary for the performance of

manage services from you or your employer (including contracting, supplier due diligence, payment and expense reporting and financial audits).	Contact Professional Financial	a contract (where you have a contract with us as an individual). Our legitimate business interest in operating our business, ensuring a safe environment for our residents, tenants, homeowners, staff and suppliers, and selecting appropriately skilled and qualified suppliers.
To assess your working capacity.	Identity Contact Professional	Necessary for the performance of a contract or in order to take steps to enter into a contract (where you have a contract with us (or propose to enter into a contract with us) as an individual). Our legitimate business interest in operating our business, ensuring a safe environment for our residents, tenants, homeowners, staff and suppliers, and selecting appropriately skilled and qualified suppliers.
To confirm information on CVs and performance reference checks, to assess you or your employer's suitability to work for us.	Identity Contact Professional	Necessary for the performance of a contract or in order to take steps to enter into a contract (where you have a contract with us (or propose to enter into a contract with us) as an individual). Our legitimate business interest in operating our business and ensuring a safe environment for our residents, tenants, homeowners, staff and suppliers, and selecting appropriately skilled and qualified suppliers.
For equal opportunities monitoring	ldentity Professional	Our legitimate business interest in operating our business and ensuring a safe environment for our residents, tenants, homeowners, staff and suppliers. Where necessary to comply with our legal obligations.
For health and safety records and management.	Identity Contact	Our legitimate business interest in operating our business and ensuring a safe environment for our residents, tenants,

		homeowners, staff and suppliers. Where necessary to comply with our legal obligations.
For security vetting and criminal records checks (where applicable and allowed by law).	Identity Contact	Where necessary to comply with our legal obligations. Our legitimate business interest in operating our business and ensuring a safe environment for our residents, tenants, homeowners, staff and suppliers.
For CCTV monitoring and other security of company facilities.	Identity	Our legitimate business interest in operating our business and ensuring a safe environment for our residents, tenants, homeowners, staff and suppliers.

# Source of personal information

We may receive some of your personal information detailed above (such as your name, contact details, job title, visa or permit documents and information about your job history) from third party sources, such as your employer or your employer's company website. We may also collect this personal information from publicly available sources, such as LinkedIn, Facebook or Twitter.

### Special categories of data

Some of the personal information that we collect about you or which you provide to us about you or your employees may be special categories of data. Special categories of data includes information about your physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical beliefs, trade union membership and biometric data. An example of where we collect and process your special category data is if you have an accident at one of our properties. We process your special category data based on:

- your explicit consent;
- where necessary for the establishment, exercise or defence of legal claims; or
- where necessary to protect yours or another's vital interests (e.g. in the case of an emergency).

Information we need to provide services to you

Please note that we need certain types of personal information so that you or your employer can provide services to us. If you do not provide us with such personal information, or if you or your employer ask us to delete it, you may no longer be able to provide services to us.

### (e) Our Relationship With You

Whatever our relationship with you is, we also collect, use and store your personal

information for the following additional reasons:

- to deal with any referrals, enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- for internal corporate reporting, business administration, statistical analysis, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so for the purposes of running, growing and developing our business;
- 3. to comply with any procedures, laws and regulations which apply to us this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and
- to establish, exercise or defend our legal rights this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

Please note that we do not carry out any automated processing of your personal data.

# 2.3 How and why we share your personal information

We may share your personal information with Pegasus Homes Limited companies where it is in our legitimate interests to do so for internal administrative purposes (for example, ensuring consistent and coherent delivery of retirement living and associated services to our homeowners and tenants, customers, corporate strategy, compliance, auditing and monitoring, research and development and quality assurance).

We will share your personal information with the following third parties or categories of third parties:

- 1. Tunstall who provide you with our out of hours emergency support service. Tunstall will also share your personal information with us;
- 2. our other service providers and subcontractors, including but not limited to payment processors, utility providers, suppliers of technical and support services, legal advisers, insurers, logistic providers, and cloud service providers;
- 3. public agencies and the emergency services;
- 4. companies that assist us in our marketing, advertising and promotional activities;
- 5. companies that provide our public relations service;
- 6. analytics and search engine providers that assist us in the improvement and optimisation of our website;
- 7. Aprico Limited who assist on moving from your home into one of our properties as part of the Pegasus Homes service;
- 8. a handyman service available upon request as part of the Pegasus Homes' service for new owners; and
- 9. any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for any purpose other than to provide services for us.

We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

We will also disclose your personal information to third parties

- 1. where it is in our legitimate interests to do so to run, grow and develop our business:
- 2. such as to solicitors or removal companies where you ask us to make contact with these on your behalf;
- 3. if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
- 4. if substantially all of the Pegasus Homes Limited or any of its affiliates' assets are acquired by a third party, in which case personal information held by us will be one of the transferred assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- 6. in order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- 7. to protect the rights, property, or safety of the Pegasus Homes, our staff, our customers (including homeowners and tenants) or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction; and
- 8. We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our goods and services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

#### 2.4 How long we store your personal information

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights. If you would like information regarding the specific retention periods applicable to your personal data, please contact us.

### 2.5 Your rights

You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at <a href="mailto:dataprotection@pegasushomes.co.uk">dataprotection@pegasushomes.co.uk</a>.

You have the following rights:

Right to withdraw consent	If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at <u>dataprotection@pegasushomes.co.uk</u> and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to be able to provide any associated services to you (for example, if those services require use of your special categories of data such as health information).
Right of access	You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area ("EEA").
Right to update your information.	You have a right to request an update to any of your personal information which is out of date or incorrect.
Right delete your information	You have a right to ask us to delete any personal information which we hold about you in certain specific circumstances. We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort.
Right to restrict the use of your information	You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort.
Right to stop marketing	You have a right to ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.

Right to data portability	You have a right to ask us to provide your personal information to a third party provider of services. This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.
Right to object	You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest. We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims. If an exception applies, we will tell you this when responding to your request. We may request you to provide us with information necessary to confirm your identity before responding to any request you make.

# 2.6 Marketing

We may collect and use your personal information for undertaking marketing by email, telephone and post.

We may send you certain marketing communications (including electronic marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes.

However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.

If you wish to stop receiving marketing communications, you can unsubscribe using the link on applicable communications from us or by contacting us by email at <a href="mailto:dataprotection@pegasushomes.co.uk">dataprotection@pegasushomes.co.uk</a>.

### 2.7 International data transfers

Your personal information may be used, stored and/or accessed by staff operating outside the UK working for us, other members of our group or suppliers.

If we provide any personal information about you to any such non-UK members of our group or

suppliers, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this privacy policy. These measures may include:

- 1. in the case of transfers to EEA-based entities, the UK government has recognised these countries as providing adequate protection; or
- 2. in the case of entities based in other countries outside the UK and EEA (including the US), entering into approved standard contractual arrangements with them.

Further details on the steps we take to protect your personal information, in these cases are available from us on request by contacting us by email at <u>dataprotection@pegasushomes.co.uk</u> at any time.

# 2.8 Risks and how we keep your personal information secure

The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private.

For this reason, Pegasus Homes is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information through the use of appropriate organisational and technical measures including but not exclusive of staff training, lockable storage, shredding facilities, encrypted laptops and PCs, all G-suite accounts have extra security in the form of two-step authentication and all PC's & laptops have anti-virus software.

In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

# 2.9 Links to other websites

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators.

This privacy policy only applies to the personal information that we collect or which we receive from third party sources, and we cannot be responsible for personal information about you that is collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites.

We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

# 2.10 Changes to our privacy policy

We may update our privacy policy from time to time. We will update you of any material changes to our privacy policy by placing a notice on our website, by sending you an email, and/or by some other reasonable means.

# 2.11 Further questions & how to make a complaint

If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact us at <u>dataprotection@pegasushomes.co.uk</u>. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

You are also entitled to make a complaint to the Information Commissioner's Office (ICO) (https://ico.org.uk/). Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.