

# PRIVACY POLICY

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## 1. Privacy and Your Personal Data

1.1 AJ Homes Limited is committed to protecting the privacy of our users and customers. This privacy policy ("Privacy Policy") is intended to inform you on how we gather, define, and utilise your Information (as defined below).

1.2 It applies to Information collected by us, or provided by you, whether in our office(s), over our Website (including the mobile optimised version of the website accessible from your portable hand-held device), our forthcoming App, or in any other way (such as over the telephone). It is also intended to assist you in making informed decisions when using our Website, App and our products and services. Please take a minute to read and understand the policy.

1.3 All your personal Information shall be held and used in accordance with the EU General Data Protection Regulation 2016/679 ("GDPR") and national laws implementing GDPR and any legislation that replaces it in whole or in part and any other legislation relating to the protection of personal data. If you want to know what information we collect and hold about you, or to exercise any of your rights as set out in section 9 below, please write to us at the below address or via email at [gdpr@aj-homes.co.uk](mailto:gdpr@aj-homes.co.uk):

FAO: GDPR Department  
AJ Homes Limited  
4 Flaxpits Lane,  
Winterbourne,  
Bristol.  
BS36 1JX

1.4 AJ Homes Limited is the controller of your Information for the purposes of the GDPR and is a company registered under number 6223187 and whose VAT number is 933 7216 25.

## 2. What Information Do We Collect on our Website?

2.1 When you visit our Website (including the mobile optimised version of the website accessible from your portable hand-held device) you may provide us with personal information such as name, postcode, email address, mobile phone number, credit, debit account details and information about other members of your family who might be interested in our services ("Information"). You may provide us with Information in a number of ways:

- a) by supplying us with the Information as listed above, on an individual basis by registering as a registered user or subscribing to receive updates or offers from us. To become a registered user you must provide us with your name, postcode, and email address, but you may also provide us with additional information if you choose to do so.
- b) by corresponding with us by email, in which case we may retain the content of your email messages together with your email address and our responses;
- c) through any preferences and areas of interest as advised by you on subscribing to our online services;
- d) by Information provided when you use our App (see below); and
- e) by Information provided when you use our mobile optimised website from your portable hand-held device including details of your physical location, where you have agreed to it being used.

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2.2 From time to time we may give you the option to provide us with Information about other people in your life, for example as a registered user, you have the option to tell us whether you have any children and if so their gender and the month and year of their birth We use this Information to tell you about properties that may be relevant to your family members.

2.3 We may collect Information about your computer, including where available your IP address, operating system, browser type and the geographical location of your computer, for system administration purposes. We may also report aggregate information to our advertisers. This is statistical data about browsing actions and patterns and does not identify you as an individual.

### **3. What Information do we collect on our forthcoming App?**

3.1 When using our App, you may provide us with the following Information:

- a) your name and contact details (email address and mobile telephone number);
- b) further information (mobile phone number, details about other members of your family who might be interested in our services, if you use the App to register as a registered user or subscribe to receive updates or offers from us. To become a registered user you must provide us with your name, postcode and email address, but you may also provide us with additional information if you choose to do so;
- c) information which allows us to identify credit or debit account details to pay for services or receive payments from us or complete a transaction with you;
- d) your physical location, where you have agreed to it being used where you allow the App to access your location settings; and
- e) other Information that may be provided by you when adding content to our App, or to our social network pages such as Facebook.

### **4. What Information do we collect in our office(s) or elsewhere?**

4.1 When you are in our office(s), we may collect the following Information:

- a) your name and contact details (email address and mobile telephone number);
- b) further information mobile phone number, details about other members of your family who might be interested in our services, if you use the App to register as a registered user or subscribe to receive updates or offers from us. To become a registered user you must provide us with your name, postcode and email address, but you may also provide us with additional information if you choose to do so;
- c) information which allows us to identify credit or debit account details to pay for services or receive payments from us or complete a transaction with you;

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## 5. How we use your Information

5.1 We will hold, use and disclose your Information for our legitimate business purposes including:

- a) to keep you up to date about important changes to our business;
- b) to direct-market products and services (including push notifications), advise you of news and industry updates, events, promotions and competitions and other information. Before we do so, you will be given an option to opt-out of such communications and an option to unsubscribe will also be provided with each communication;
- c) to apply profiling technology which analyses our customers' engagement with our direct marketing communications, activity and interests so that we can send you content that is relevant to you;
- d) to answer your queries;
- e) to provide further services to you by sharing your Information with other companies within our group of companies if applicable, as well as trusted third parties. Further details about this are set out in the section 8 below on Sharing your Personal Information;
- f) to release Information to regulatory or law enforcement agencies, if we are required or permitted to do so.

5.2 We may process certain sensitive personal data (known as special category data in GDPR) where you include it in information you send to us e.g. if you include information about your health. We have processes in place to limit our use and disclosure of such sensitive data other than where permitted by law.

## 6. The legal basis for processing your Information

6.1 Under GDPR, the main grounds that we rely upon in order to process your Information are the following:

- a) Necessary for compliance with a legal obligation – we are subject to certain legal requirements which may require us to process your Information. We may also be obliged by law to disclose your Information to a regulatory body or law enforcement agency;
- b) Necessary for the purposes of legitimate interests - either we, or a third party, will need to process your Information for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your Information protected. Our legitimate interests include responding to requests and enquiries from you or a third party, optimising our website and customer experience, informing you about our products and services and ensuring that our operations are conducted in an appropriate and efficient manner;
- c) Consent – in some circumstances, we may ask for your consent to process your Information in a particular way.

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## 7. How we share your Information

7.1 In certain circumstances we will share your Information with other parties. Details of those parties are set out below along with the reasons for sharing it.

a) Other parties within our group of companies If applicable:.

b) Trusted third parties: In order to provide certain services, we will share your information with third party service providers such as IT infrastructure companies and email logistics providers. We will not share your data with any third party where it is not necessary to do so to provide a service to you.

c) Regulatory and law enforcement agencies. As noted above, if we receive a request from a regulatory body or law enforcement agency, and if permitted under GDPR and other laws, we may disclose certain personal information to such bodies or agencies.

d) New business owners. If we or our business merges with or is acquired by another business or company, we will share your personal information with the new owners of the business or company and their advisors. If this happens, you will be sent notice of such event.

## 8. How long we hold your Information

We will only retain your Information for as long as is necessary for the purpose or purposes for which we have collected it. The criteria that we use to determine retention periods will be determined by the nature of the data and the purposes for which it is kept. For example, if we receive your Information through a competition entry, we will retain your data for as long as is necessary to administer the competition. If we receive your Information when you apply for a job, we will retain your data for as long as is necessary to process your application, and maintain application statistics. We will not directly market to you for longer than three (3) years, unless you consent to receive direct marketing by opting in again before the expiry of that three (3) year period. In certain circumstances, once we have deleted or anonymised your data, we may need to retain parts of it (for example, your email address), in order to comply with our obligations under GDPR or other legislation, or for fraud detection purposes.

## 9. Your rights relating to your Information

9.1 You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

a) Right of Access. You have the right at any time to ask us for a copy of the Information about you that we hold, and to confirm the nature of the Information and how it is used. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

b) Right of Correction or Completion. If Information we hold about you is not accurate, or is out of date or incomplete, and requires amendment or correction you have a right to have the data rectified, updated or completed. You can let us know by contacting us at the address or email address set out above.

c) Right of Erasure. In certain circumstances, you have the right to request that Information we hold about you is erased e.g. if the Information is no longer necessary for the purposes for which it was

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collected or processed or our processing of the Information is based on your consent and there are no other legal grounds on which we may process the Information.

d) Right to Object to or Restrict Processing. In certain circumstances, you have the right to object to our processing of your Information by contacting us at the address or email address set out above. For example, if we are processing your Information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to object to use of your Information for direct marketing purposes. You may also have the right to restrict our use of your Information, such as in circumstances where you have challenged the accuracy of the Information and during the period where we are verifying its accuracy.

e) Right of Data Portability. In certain instances, you have a right to receive any Information that we hold about you in a structured, commonly used and machine-readable format. You can ask us to transmit that Information to you or directly to a third party organisation.

This right exists in respect of Information that:

- you have provided to us previously; and
- is processed by us using automated means.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to Information of others without their consent.

9.2 You can exercise any of the above rights by contacting us at the address or email address set out above. You can exercise your rights free of charge.

9.3 Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

## **10. Consent**

To the extent that we are processing your Information based on your consent, you have the right to withdraw your consent at any time. You can do this by unsubscribing via the link provided in any direct marketing communication, or contacting us at the address or email address set out above.

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## 11. Cookies

11.1 Similar to other commercial websites, our Website uses a technology called "cookies" and web server logs to collect information about how our Website is used. A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies

11.2 Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our Website, and the websites visited just before and just after our Website.

11.3 Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting our Website and which parts of the website are most popular. This helps us gather feedback so that we can improve our Website and better serve our customers. Cookies do not allow us to gather any personal Information about you and we do not generally store any personal Information that you provided to us in your cookies.

11.4 We use 'session' cookies which enable you to carry information across pages of the Website and avoid having to re-enter information. Session cookies enable us to compile statistics that help us to understand how the Website is being used and to improve its structure.

11.5 We also use 'persistent' cookies which remain in the cookies file of your browser for longer and help us to recognise you as a unique visitor to the Website, tailoring the content of certain areas of the Website to offer you content that match your preferred interests.

## 12. Website Accessibility

12.1 AJ Homes recognises the importance of providing a website that is accessible to everyone and is easy to use. This section outlines our ongoing commitment to making our online services accessible and explains some of the accessibility features of this Website.

12.2 Website accessibility means that people with disabilities can use the Website. More specifically, Website accessibility means that people with disabilities can perceive, understand, navigate, and interact with the Website, and that they can contribute to the Website. Website accessibility also benefits others, including older people with changing abilities due to aging. (Quote from <https://www.w3.org/WAI/intro/accessibility.php>)

12.4 At AJ Homes we are committed to making our Website accessible to as many abled and less abled people as possible. We will continue to review, test and modify our Website for usability and accessibility issues using a combination of both manual and automated testing tools. These tools and techniques help us to aim towards meeting (where possible) the W3C guidelines as part of our ongoing commitment towards an accessible Website.

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## 13. Changes to our Privacy Policy

This privacy policy can be changed by us at any time. If we change our privacy policy in the future, we will advise you of material changes or updates to our privacy policy by email, where we are holding your email address.

## 14. Complaints

If you are unhappy about our use of your Information, you can contact us at the address or email address above. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:

Telephone: [0303 123 11113](tel:030312311113)

Website: <https://ico.org.uk/concerns/>

Post: Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

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Original Privacy Policy created: 23.04.2018

Privacy Policy amendment date(s):