

WELCOME TO THE ADALTA REAL HOLDINGS' PRIVACY NOTICE.

Our full details are: Adalta Real Holdings Limited, The Byre, Home Farm Drive, Upton Estate, Banbury, Oxfordshire, OX15 6HU

Full name of legal entity: Adalta Real Holdings Limited, Registered in England and Wales under No. 10094594

Name and email address of data privacy manager: James Hill – james.hill@adaltareal.com

Adalta Real Holdings respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data, whether you visit our website (regardless of where you visit it from) or deal with us in person, and tell you about your privacy rights and how the law protects you.

1. Important information

This privacy notice aims to give you information on how Adalta Real Holdings collects and processes your personal data, including any data you may provide through this website or in person.

Our website is not intended for children and we do not knowingly collect data relating to children, our services are provided only to adults.

We may amend this privacy policy from time to time.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Adalta Real Holdings is the controller and responsible for your personal data (Adalta Real Holdings referred to as "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager at Adalta Real Holdings, 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, please contact the data privacy manager whose details are as follows: james.hill@adaltareal.com

If you have any query or complaint, we would appreciate the chance to deal with your concerns and ask you to please contact us in the first instance. If we are unable to deal with issue, 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).

This 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.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Contact Details** includes current address, previous or future address, email address and telephone numbers.
- **Financial Details** includes first name and last name, user name or other identities, marital status, title.
- **HR Details** includes annual leave, sick leave and performance related information, qualifications, employment history, ethnicity, disability, potentially health information and/ or T.U membership and pension details.
- **Transaction Data** includes details about the properties involved in the transaction payments to and from you and other details of products and services you have requested 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 this website].

We do not generally 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), however in relation to employee records, there may be some inclusion of information which is “special category personal data”, which we are entitled to hold under employment law. Nor do we collect any information about criminal convictions and offences.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

PLEASE SEE THE TABLE below for more detailed information relating to our management of data.

3. 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 have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

4. 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.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Data Subject	Personal Data we may collect	How we collect it	How we use your data	Disclosure / Sharing Data / Data Security	How long we keep your data
Employees of Adalta Real Holdings	Contact details Financial details HR details including: Pension details Tax details Annual Leave Sick Leave and performance related information	We ask you to provide your data on the basis of your contract of employment with us.	For payroll function, HR function, in our role as your employer.	You allow us to share your professional contact details (personal data) to be used in the course of the normal performance of your duties as an employee, based on our legitimate interest as your employers.	For 6 years following the end of your employment before deletion and/or destruction of the data.
Our own Employment Candidates	Contact details HR details including: Qualifications Employment history Ethnicity Disability Information	We ask for your personal data to progress your job application, based on your consent and our legitimate interest as interviewers in processing employee data and employer's record keeping.	HR/Recruitment We use your data to perform our HR function: considering, accessing and interviewing applicants.		If you are successful and become an employee, we keep your data as above (our Employees). If you are not successful, then we keep your data for six months before deleting/destroying it.

Vendors	<p>Contact details Financial details Transactions details Profile and Technical Data (if online)</p> <p>Marketing Data</p>	<p>We ask for your personal data on the basis of our contract with you (for the sale of your property).</p>	<p>We use your data to register you as our client and progress the sale of your property.</p>	<p>We will disclose your personal data to solicitors and other professionals and services during the sales process.</p>	<p>We have a legitimate interest in retaining your personal data for as long as possible in order to continue to provide services to you, including sending invitations, newsletters or Marketing. You may object and restrict this processing by request.</p>
Purchasers	<p>Contact details Financial details Transaction details Profile and Technical Data (if online)</p> <p>Marketing Data</p>	<p>We ask for your personal data on the basis of our legitimate interest (to provide you with details of properties) and/or your consent, to register you as a potential purchaser and if applicable progress the purchase of a property.</p>	<p>We use your data to register you as a potential purchaser and progress the purchase of your property.</p>	<p>We will disclose your personal data to solicitors and other professionals during the purchase process.</p>	<p>We have a legitimate interest in retaining your personal data for as long as possible in order to continue to provide services to you, including sending invitations, newsletters or Marketing. You may object and restrict this processing by request</p>

Tenants	Contact details Financial details Transaction details Profile and Technical Data (if online) Marketing Data	We ask for your personal data on the basis of our legitimate interest (to provide you with details of properties) and/or consent with you to register you as a potential tenant and if applicable progress with the renting of a property.	We use your data to register you as a potential tenant and progress your tenancy.	We will disclose your personal details to the landlord of the property you lease (on the basis of your contract with him/ her). During your tenancy we may disclose your personal details to third party service providers to upkeep or repair the property.	We have a legitimate interest in retaining your personal data for as long as possible in order to continue to provide services to you, including sending invitations, newsletters or Marketing. You may object and restrict this processing by request
Landlords	Contact details Financial details Transaction details Profile and Technical Data Marketing Data	We ask for your personal data on the basis of our contract with you to register you as our client and progress the rental of your property.	We use your data to register you as our client and progress the rental of your property.	We will disclose your personal details to your tenant (on the basis of your lease of your property to him/ her), and to solicitors and other professionals and services during the rental process or the tenancy.	We have a legitimate interest in retaining your personal data for as long as possible in order to continue to provide services to you, including sending invitations, newsletters or Marketing. You may object and restrict this processing by request
Professional Clients	Contact details Financial details Transaction details Technical and Profile Data (if online) Marketing Data	We ask for your personal data on the basis of our contract with you as our client (for the provision of management valuation and consultancy services).	We use your data to register you as our client and provide management valuation and consultancy services.	We will disclose your personal details to your employees (this may be/ is necessary to conclude their employment contract), as well as to solicitors and other professionals and services in order to perform our contractual obligations with you.	We have a legitimate interest in retaining your personal data for as long as possible in order to continue to provide services to you, including sending invitations, newsletters or Marketing. You may object and restrict this processing by request.

Suppliers	Contact details of supplier or employees of supplier Transactions Data Technical Data	We collect your or your employees' personal data on the basis of our contract with you.	We use your or your employees' personal data to contact you (or your employees at their place of work), when they represent you in their role as your employee in the performance of our contract with you.	We will disclose your (or your employees') personal data to our clients if you provide services to them under our management of their property (tenancy, sale or professional estates management).	We will retain your (and/or your employees') contact details for up to six (6) years after the end of our contractual relationship with you (then delete or destroy records).
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In relation to all of the above, we may retain Technical data where you have contacted us online and we may process this while maintaining our software and computer systems.