



SCOTIA

SCOTIA HOMES PRIVACY POLICY

Your privacy is important to Scotia Homes Ltd. This privacy statement provides information about the personal information that Scotia Homes Ltd collects, and the ways in which Scotia Homes Ltd uses that personal information.

1. IMPORTANT INFORMATION AND WHO WE ARE

1.1 This privacy notice is issued on behalf of Scotia Homes Limited ("we", "us" or "our"), a company incorporated under company number and have our registered office at 50 Lothian Road, Festival Square, Edinburgh, EH3 9WJ.

1.2 This privacy notice will inform you about what data we collect from you, how we use it circumstances where we may disclose this data to others and how we keep it secure.

1.3 We take the issue of security and data protection very seriously and strictly adhere to applicable data protection legislation. In accordance with the General Data Protection Regulation (EU) 2016/679 we are data controller of any personal data that you provide us.

2. INFORMATION THAT WE COLLECT FROM YOU

2.1 What is personal data?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data from which an individual can no longer be identified (anonymous data).

2.2 What personal data do we collect from you?

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

- **Identity Data:** includes first name, last name, username or similar identifier, marital status, title, date of birth, gender and copy signature;
- **Contact Data:** includes address, email address and telephone numbers;
- **Financial Data:** includes bank account details, budget and current level of debt;
- **Marketing and Communications Data:** includes how you heard about us, your preferences in receiving marketing from us and our third parties and your communication preference;



- **Connected Persons Data:** includes information about dependents and spouses;
- **Professional Adviser Data:** includes data about solicitors and financial advisers;
- **Mortgage Data:** includes mortgage amount and term;
- **Existing Home Data:** includes value of your existing home and date it was purchased; and
- **Website Data:**
 - **Technical Data:** includes internet protocol (IP) address, your login data, 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; and
 - **Usage Data:** includes information about how you use our website, products and services.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions:** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - request information on any of the products or services that we offer;
 - fill in any forms including reservation forms;
 - interact with our website, marketing and advertising;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - register to receive or download information, newsletters or other documentation;
 - sign up to attend any events;
 - enter a competition, promotion or survey; and
 - give us feedback.
- **Automated technologies or interactions:** As you interact with our website, we may automatically collect personal data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

We do not receive personal data about you from third parties.



4. HOW WE USE YOUR PERSONAL DATA

4.1 What processing grounds do we rely on?

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:

- Where we need it to perform the contract we are about to enter into or have entered into with you, such as the sale of a home;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law. Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

4.2 How do we use your information?

We use your information:

- to provide you with information and services you have requested;
- to facilitate and advance transactions we enter with you, including reservations and sales of properties;
- to help us improve our service and understand more about how our website is used;
- to be able to send you communications, including marketing communications, that may be of interest to you, either electronically or otherwise; and
- for all other purposes consistent with the proper performance of our operations.

We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will explain the legal basis which allows us to do so.



5. DISCLOSURE OF YOUR INFORMATION

5.1 Disclosure to selected third parties

The information you provide to us will be treated as confidential. However, we may disclose your information to other third parties who act for us for the purposes set out in the policy or for purposes approved by you, including to the National House-Building Council and suppliers who provide services including marketing, financial, cloud computing, floorcovering and installation services. We may also disclose your personal information to solicitors, financial advisers and Help to Buy agencies as appropriate.

We require all third parties to respect the security of your personal data and to treat it in accordance with applicable data protection legislation. 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.

5.2 Transferring data outside of the EEA

The information that we collect from you may be processed at a destination outside of the European Economic Area (“EEA”). We will take steps necessary in accordance with applicable data protection legislation to ensure your information is treated securely and in accordance with this privacy policy, in particular ensuring that appropriate technical and organisational safeguards are in place for processing.

6. DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For more information on our retention procedures, please contact us using the details below.



In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

7. MARKETING

7.1 It is your choice whether you receive marketing information from us. If you indicated that you are interested in receiving regular information about our activities, we will send you communications electronically. We will not contact you for marketing purposes unless you have given your prior opt-in consent.

7.2 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 contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

8. 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.

9. YOUR RIGHTS

9.1 Individual rights

Under applicable data protection legislation, you have the right under certain circumstances to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of



the personal information we hold about you and to check we are lawfully processing it;

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below);
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party). You also have the right to object where we are processing your personal information for direct marketing purposes;
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- Request the transfer of your personal information to another party; and
- Withdraw your consent to the processing of your personal information at any time.

If you would like to exercise any of your rights above, please contact us using the details below.

9.2 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.

9.3 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.

9.4 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.

10. CHANGES TO OUR PRIVACY POLICY

Any changes to our privacy policy in the future will be posted to the site and, where appropriate, displayed on our premises or notified to you by e-mail.

11. YOUR DUTY TO INFORM US

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.

12. CONTACT US

12.1 Contact Details

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact: please contact privacy@scotia-homes.co.uk.

12.2 Making a complaint

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 using the details set out above.