

CALA GROUP PRIVACY NOTICE
IT'S BETTER TO OPT IN THAN MISS OUT





CALA'S PRIVACY PROMISE

It's better to opt in than miss out

Your privacy is important, and so is your house move. We'd like to make sure you get the information you need to make your move with CALA homes.

If you opt-in to email, SMS or post, we will send you news that we think you'll find interesting, including:



Release
of new homes



Incentives and
special offers



Product
information



Development
news



Invitations to
exclusive events

Please let your Sales Advisor know how you'd like to receive these. You can opt-out at any time using the links on our emails and SMS or by emailing cala.group@cala.co.uk

Even if you don't opt-in, your Sales Advisor will contact you to follow-up your enquiry.

The rest of this leaflet gives you the details about how we use and safeguard your personal data.

If you have any questions please email cala.group@cala.co.uk and we'll be happy to help.

Who are we?

We are CALA Group (Holdings) Limited, a company registered in England & Wales, Company Number 08428265, Registered Office - CALA House, 54 The Causeway, Staines-upon-Thames, Surrey TW18 3AX and its subsidiary companies ("CALA"):

We provide this Privacy Notice to inform you of our policy and practices and of the choices you can make about the way your information is collected when you visit our website, www.cala.co.uk or contact us by phone or email cala.group@cala.co.uk

The website is operated by CALA Management Limited, registered in Scotland under company number SC013655 and has its registered office at Adam House, 5 Mid New Cultins, Edinburgh, EH11 4DU (the "Company", "we") on behalf of CALA.

Your privacy is of the utmost importance to CALA.

1. Information collected by the Company

Personal information means information that identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual. This includes any information provided to us in relation to your use of our website.

a) *We may collect and store information you provide us with*

This is information about you that you give us by filling in forms on our website, or by corresponding with us by phone, e-mail or otherwise and includes information you provide when you register to use the website, and use the services provided by the website. The information you give us may include your name, address, e-mail address, phone number, as well as details of any comments you provide to us.

b) *We will collect information when you read or download information from our website (anonymised IP addresses and cookies)*

We will collect information generated by your visit to the website. This may include your anonymised IP Address (an IP address is a number that is automatically assigned to your computer whenever you are surfing the Internet); the type of browser, operating system and device used to access the website; the date and time you access our website; the pages you visit; and if you visited our website from another website, the address of that other website.

Some of this information may be stored on your computer in the form of a cookie. This information helps the web server track such things as your preferences and any data you submit while browsing our website. For example, the cookie can store login details and information relating to our CALA Exclusive account and user preferences.

To find out more about cookies, visit www.cala.co.uk/cookies

c) *We may monitor, record, store and use any telephone, email or other communication with you*

We will combine this information with information you give to us and the other information we collect about you. We will use this combined information for the purposes set out below (depending on the types of information we receive).

2. How do we use your information?

CALA will use your information for the following purposes:

- a) to provide you with services you have requested;
- b) to administer the website and for internal operations, including data analysis, testing, research, statistical and survey purposes;
- c) to measure or understand the effectiveness of advertising we serve to you and others, and to send relevant advertising to you; and
- d) to keep you informed about relevant CALA developments and CALA news.

More specifically CALA will use your personal information as follows:

e) *When you read or download information from our website (IP addresses and cookies)*

We will collect and store information collected from cookies for statistical purposes. We may use this information to provide you with a more personal service and to assist in analysing website traffic and usage. This information does not identify you personally unless you register or make an enquiry with us, at which point CALA will combine it with the other information collected about you and use it for the purposes noted above.

f) *When you send CALA an enquiry or email*

The personal details collected from you are stored electronically and can be accessed by CALA. We will use the information in order to respond to your request or otherwise reply to the subject of the enquiry or email. Remember that email is not necessarily secure against interception. If your communication is very sensitive you might want to send it by postal mail instead.

We may also use your contact information to let you know about CALA products, services, future developments, news, events or special offers which may be of interest to you. Please see paragraph 8 (Your Rights) below for details about how to unsubscribe from these communications.

g) *When you register on our website*

By registering on our website, you will gain access to a CALA Exclusive account. This is your own personal webpage which stores the properties and/or developments you have selected an interest in. The personal details collected from you are stored electronically and can be accessed by CALA.

We will use the information to provide you with information on the properties and/or developments which you are interested in. We may also use your contact information to let you know about other CALA products, services, future developments, news, events or special offers which match your criteria or which may be of interest to you. You can change your contact preferences at any time by logging back into your account.

h) *When you telephone us using the number displayed on the Site or in a search engine such as Google, or when you request a callback*

We use Call tracking so that when you call us to request information we are able to return your call. By calling us or by requesting a callback you acknowledge that we may contact you by telephone on the number you have called us from for the purposes of discussing CALA developments with you. If you wish to make your telephone number private please contact your telephone provider.

i) *When you telephone us*

We may monitor, record, store and use any telephone, email or other communication with you in order to check any instructions given to us, for training purposes, for compliance purposes, for crime prevention and to improve the quality of our customer service. Recorded phone calls are held securely by Call Tracking and will be deleted after 30 days where we are required to retain it for legal or regulatory reasons. We may combine this information with other information collected about you (cookie data, for example) and use this combined information for the purposes noted above.

3. Communications and Announcements from the Site

a) *Promotional updates*

We may contact you to provide information on the specific properties/developments you have expressed an interest in, as well as other CALA products, services, future developments, news, events or special offers which match the criteria specified by you or which otherwise may be of interest to you.

We will contact you by phone, SMS, email or post only if you have given your permission. You can change your contact marketing preferences at any time by registering and accessing a CALA Exclusive account on the website, by emailing us directly at cala.group@cala.co.uk or by speaking to a CALA sales representative who will be happy to assist.

b) *Service announcements*

It may be necessary for the Company to send a service announcement email to users of our website if for example the service is temporarily suspended for maintenance. These communications will be sent to all users of the Site, but will not be promotional in nature.

4. Using your information in accordance with data protection law

Data protection laws require that we meet certain conditions before we are allowed to use your data in the manner described in this privacy notice. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. To use your personal information, we will rely one or more of the following conditions, depending on the activities we are carrying out:

a) *Legitimate interests*

To use your personal data for the purposes described in this privacy policy and in order to process your data to provide you with the information you have asked for and to send you additional marketing information in relation to the developments that you have enquired about or other similar developments, we will rely on a condition known as “legitimate interests”. It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services (namely to provide you with information on houses which we are building or are for sale) to you more effectively. We will always act reasonably and give full and proper consideration to your interests when balancing them against our legitimate interest, and will only process the minimum data required in order to achieve this legitimate interest.

b) *Consent*

If you do not specifically ask for information about our products and services we may provide you with unsolicited marketing information about our developments where you have provided your consent for us to do so.

c) *Compliance with a Legal Obligation*

When you use the Site, we will process your personal information to the extent that this is necessary for the performance of our obligations under the [Terms and Conditions](#). We may also rely on this condition if you reserve or purchase with us.

d) *Necessary for the performance of a contract*

If you reserve or purchase with us we may rely on this condition to process your data in connection with that reservation or purchase.

5. Security and where we store your information

CALA follows strict security procedures in the storage and disclosure of information that you have given us. CALA has implemented security polices, rules and technical measures to protect the personal information that we have under our control. The security measures are designed to prevent unauthorised access, improper use and disclosure, unauthorised modification and unlawful destruction or accidental loss.

Please remember that no method of transmission over the internet, or method of electronic storage is completely secure and reliable. Although we do our best to protect your personal information, we cannot guarantee its absolute security.

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

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our third-party suppliers. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

6. Third Parties

We may appoint suppliers, sub-contractors or agents to assist us in using your data (i.e. carrying out the administrative and advertising activities set out in paragraph 2) and in order to provide you with other service(s) that you request. Examples of such services include following up on enquiries made by you, providing further information on CALA products and carrying out viewings, or in connection with reservation/purchase of CALA properties. Accordingly, we may pass on your personal information to group companies or to any of CALA's approved suppliers, sub-contractors or agents for these purposes. There may also be occasions when we are required by law to pass on your information, for example when we notify the local authority about a purchase for council tax purposes. Where you do purchase a CALA home, we may also pass your personal information to utility providers to set up services for you in accordance with your instructions.

Examples of the kind of third parties we work with are:

- Technology suppliers who support our website and other business systems
- Direct marketing companies and Media buyers who help us manage our electronic and printed communications with you
- Google (and its larger network) /Social Media platforms (such as Facebook) to show you products that might interest you while you're browsing the internet
- Demographic data suppliers who help us to understand the populations of areas in which we are operating
- Estate agents or surveying companies in order to value your current home for a part exchange against a CALA Home (where you have asked us to do so)
- Independent Financial Advisors (for limited pre-reservation purposes)
- The National House-Building Council (NHBC), our warranty and insurance provider
- CALA Homes employs third party suppliers to provide services including utilising the services of a credit reference agency (<https://www.transunion.co.uk/legal-information/bureau-privacy-notice>)

If you contact CALA Homes through Facebook Messenger, your data will be used to provide you with the services you have requested. The data will be stored within Facebook Messenger and Chafuel (the Chatbot platform). You may receive an automated follow-up message after your enquiry but you can unsubscribe from this at any time. Unless you ask us to, we will not store or use the information you send through Facebook Messenger in any other way.

7. Data Retention

If you submit your details for the purposes of enquiring about a specific property or development, the personal information we collect on the Site and that you provide when you contact us will be held for the period of time that the specific development is on sale, plus an additional 18 months thereafter (the "Time Period").

If you ask for your details to be applied to a new property or development the Time Period will begin again.

After the Time Period has elapsed, information that could be used to identify you personally will be removed; however your postcode and some demographic information may be retained. This information will be used for our research purposes in an aggregated form only.

If you purchase a home from CALA, a different retention period will apply. This will be explained to you at the time you reserve a property.

8. Your Rights

You have a number of rights under data protection law in relation to the way we process your personal data. These are set out below. You may contact us using the details on our site to exercise any of these rights, and we will respond to any request received from you within one month from the date of the request.

Our contact for data protection matters is DataProtection@cala.co.uk

Please address any questions, comments and requests regarding our data processing practices there in the first instance.

a) *Access to your personal data and data portability*

You have a right of subject access. This means that you are entitled to request a copy of your personal data and we will grant you access or provide you with all personal data that we hold about you, subject to some limited exemptions (for example, you will not necessarily be entitled to access third party personal information).

Also, you have a right of data portability. Under this right for information which you have provided to us, you are entitled to request that this is provided to you (or to another organisation) in a portable, machine readable, electronic format.

b) *Unsubscribe*

You have the right to withdraw your consent for us to provide you with further information about specific properties or developments. To do this, please follow the unsubscribe option attached to all of our marketing emails and SMS messages. You can also unsubscribe via your CALA Exclusive account or by emailing cala.group@cala.co.uk

c) *Rectify your personal data*

You have the right to require us to rectify any inaccurate personal data held by us about you. If there is any inaccuracy in the data that we hold about you, please contact cala.group@cala.co.uk

d) *Erase your personal data*

You have the right to require us to erase personal data held by us about you.

e) *Object to our use of your personal data*

You have a right to object to our processing of personal data held by us about you (for example, if you would not like to be subject to any profiling).

If you have any concerns regarding our processing of your personal data, we would be happy to address your query in the first instance. However, if you are not satisfied with our handling of data, any request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office.

Their address is: **First Contact Team, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.**

9. Changes to Privacy Notice

Any changes we make to our privacy notice in the future will be posted on our website, www.cala.co.uk/privacy. You should check this webpage regularly in order to be aware of these changes, as they may affect you.

10. Hyperlinks

In our commitment to providing the best service and information to you, we may provide links to third party websites. If you access those links, you will leave the website. CALA does not control those websites or their privacy practices, which may differ from CALA's. CALA does not endorse or make any representations about third party websites. The CALA Privacy Notice does not cover the personal information that you choose to give to unrelated third parties. We encourage you to review the Privacy Notice of any company or other entity operating a website before submitting your personal information. Some third party companies may choose to share their personal information with CALA; that sharing is governed by the third party company's privacy policy.



FEBRUARY 2020

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