



THE PARK LANE GROUP PRIVACY STATEMENT

PRIVACY STATEMENT

This Privacy Statement applies to the use and processing of Personal Information collected and used by **The Park Lane Group**.

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Personal information is information, or any combination of separate pieces of information, that could be used to identify you.

We may amend our privacy statement to reflect changes to our business, website or to data protection legislation. We therefore ask you to revisit this privacy statement on a regular basis to ensure you are familiar with its terms.

This privacy statement only applies to this website; if you follow a link out of our site or leave our site in some other way, this privacy statement will no longer apply.

The phrases "The Park Lane Group", "Park Lane Group", "us" or "we" shall, when used herein, mean those members of The Park Lane Group on behalf of and in respect of whom this Statement is made.

By using The Park Lane Group website and/or mobile applications or otherwise providing your Personal Information to The Park Lane Group, you agree to the collection, use and sharing of your information in accordance with this Privacy Statement.

Please read this Privacy Statement carefully. Should you have any queries in respect of this statement or our use of personal data, please contact The Park Lane Group **Data Protection Officer** (via the means listed below).

The privacy statement sets out (1) who we are and describes (2) the information we collect (3) how we use your information (4) how you can find out more.

(1) WHO WE ARE

The Park Lane Group, incorporating Park Lane Investment Properties Ltd - company number 02928806, Park Lane Homes (South East) Ltd - company number 04032168, Park Lane Developments (South East) Ltd - company number 02968496, Park Lane Partnership Ltd - company number 09438857, Park Lane Residential Properties Ltd - company number 08796778, Park Lane Properties, Park Lane Residential Lettings. Registered Address of Limited Companies: Park Lane House 141-145 Bohemia Road, St. Leonards on Sea, East Sussex TN37 6RL.

If you have any queries about the information we hold on you, please contact us at the address above.

We are entered in the Register of Data Controllers with the ICO (Office of Information Commissioner) with registration number: Z541067X and we are the data controller of any personal data that you provide to us.

Our **Data Protection Officer** is **Sue McGreevy**.

Any questions relating to this statement and our privacy practices should be sent:

by email to mail@parklanegroup.net

or

by post to **141-145 Bohemia Road, St Leonards On Sea, East Sussex, TN37 6RL.**

(2) THE INFORMATION WE COLLECT

We may collect information about you from a variety of sources. This includes information we collect directly from you; information we collect when you visit our website, view our online content or use mobile applications or other services; and information we collect about you from other sources.

2.1 Information we collect directly from you

We collect information from our website, from 3rd party property portals, from property application forms and from you directly when you, call or email us, or otherwise provide information directly to us. The following are examples of information we may collect directly from you:

- Name
- Email address
- Postal address
- Telephone number
- Date of birth
- Proof of ID
- Nationality
- Demographic information
- Financial information
- Payment information (such as a credit card) and bank account details
- National Insurance Number
- Future communication preferences

2.2 Information we collect when you visit our website, view our company news and promotions, use mobile applications or other services

We use cookies and other technologies to collect information when you visit our website, view our online advertisements or company news and promotions, or use mobile applications or other services. The following are examples of information we may collect with these technologies:

- Information about your device browser and operating system
- IP address
- Web pages you view
- Links you click
- Park Lane Group emails you open

2.3 Information we collect from other sources

We may obtain information about you from other sources, including publicly available sources, such as the Land Registry, social media platforms or referral agents, etc. Examples of information we may collect from other sources are:

- Name
- Postal address
- Email address
- Date of birth
- Income level
- Publicly observed activities or information made available by you to the public, such as blogs, videos, internet postings, and user generated content.

(3) WHAT WE DO WITH YOUR INFORMATION

3.1 How The Park Lane Group uses this information

We use the information we collect to deliver to you advertisements, offers, or other content tailored to your interests, and to conduct other Park Lane Group business operations. The following are examples of how we may use the information we collect:

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- To enable us to answer your questions and supply you with the services and information which you have requested.
- To undertake and perform our obligations and duties to you in accordance with the terms of our contract with you.
- To develop new products and services.
- To create and manage your account.
- To process payment for purchases or other services.
- To protect against or identify possible fraudulent transactions.
- To send you email and/or postal messages with information about The Park Lane Group brands and other content we think may be of interest to you.
- To send you email and/or postal messages with information about The Park Lane Group brands, news, promotions and other content we think may be of interest to you.
- To develop and provide Marketing tailored to your interests, including interest-based marketing.
- To analyse the use of the information we collect so that we can administer, support, improve and develop our business and the products and services we offer. Enforce our Terms and Conditions and otherwise manage our business.
- For all other purposes consistent with the proper performance of our operations and business.

The Park Lane Group will only process your information in pursuance of our **legitimate interest** if we receive any requests related to, for example, a product or service, a call-back, or specific marketing materials; we will use your personal information to fulfil your request. Where we need to manage your account and protect you against or identify possible fraudulent transactions, we will do so in accordance with our **legal obligation** placed on us under law. We will seek consent from you if we need to process your data solely identified purposes. To ensure meaningful **consent** is obtained from you, The Park Lane Group will provide you with reasonable notice ensuring that your consent is provided on an informed basis.

3.2 Information sharing

The success of our business depends on your trust, and we do not sell your personal information to marketers outside of The Park Lane Group. We share your personal information within The Park Lane Group and as described in this statement. We do not share personal information with marketers outside of The Park Lane Group unless you consent to such sharing, or as described within this statement.

3.3 Co-promotions with Carefully Selected Business Partners

We from time to time may collect personal and other information for a co-promotion or joint program with a business partner and share your information with that business partner. For these programs we will make clear at the point of collection that the information will be shared with The Park Lane Group and the participating business partner and ask for your consent as required by applicable laws.

3.4 Third-party service providers

We engage third-party service providers to perform a variety of business operations on our behalf. In so doing, we may share your Personal Information with them. We provide our service providers with only the Personal Information they need in order to perform the services we request, and we contractually require that they protect this information appropriately and not use it for any other purpose.

For example, we may rely on a 3rd party service provider to:

- Fulfil your requests and answer your questions.
- Host our sites and deliver our email or other communications.
- Manage payments or take payments on our behalf.
- Carryout maintenance and repair work to our properties.
- Analyse our data, sometimes combined with data from other sources, to send you communications.
- Conduct research and analyse data to improve our products, services and sites.
- Perform other services that we request on our behalf.

Where permitted by law, we combine Personal Information about you that The Park Lane Group has collected with Personal Information about you that a business partner has collected so we can jointly send tailored promotional communications to you. In such instances, our business partner will not be permitted to use The Park Lane Group data or the combined data for its own, independent marketing purposes. Our service provider will only be allowed to use the combined set of information to send you joint communications that we hope will be of interest to you. If you prefer not to receive these joint communications, you can always opt out by following the instructions provided in any such communication or through this Privacy Statement as indicated above.

3.5 Other situations

We may transfer or otherwise process your personal information:

- With our funders or potential funders, such as our bank and with our professional advisors who have a reasonable need to see it.
- To protect, defend or exercise the rights and property of The Park Lane Group (including enforcing our Terms and Conditions).
- When required by law and/or government authorities.

3.6 Personal Information Retention Period

We will retain Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Statement, unless a longer retention period is required or permitted by law.

3.7 Aggregated and non-personal information.

We share aggregated and/or anonymous information that does not identify you for Park Lane Group business purposes. For example, we may disclose the number of visitors to The Park Lane Group sites or services. We may also share aggregated and/or anonymous information with our business partners for their own business purposes.

Your communication options

We give you choices about how we communicate with you.

Email Communications

If you wish, you can subscribe to email alerts about information of interest to you. If you do this, we will use the information that you submit to provide alerts to you and to analyse who is receiving email alerts from us. You may ask us to update/correct or remove you from our email alert lists at any time by writing to our Data Protection Officer at the company address (see Section 1).

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Postal Mail

You can stop receiving promotional postal mail from The Park Lane Group at any time by writing to our Data Protection Officer at the company address (see Section 1) and ask to be removed from future mailing lists.

PLEASE NOTE: We will honour your request to stop receiving promotional emails and postal messages from The Park Lane Group as practicable. However, we may continue to send you service-related communications. We may keep information for record keeping to ensure we fulfil your request not to send particular types of messages.

You and your information

To the extent provided for by applicable law, you have certain rights in respect of the management of the personal data we hold about you.

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.

Access

You have the right at any time to ask for a copy of the information about you held by us in our records.

The Park Lane Group does not charge for this service and responds to reasonable requests in an appropriate timeframe.

Other rights

To the extent provided by applicable law, you have the right to request rectification of your personal data; to obtain restriction of the processing of personal data; to object to the processing of personal data (including direct marketing) and to data portability. To exercise any of these rights, please contact us as described below.

Consent

Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time by contacting us as described below. We will cease processing your personal data as soon as reasonably practicable following our receipt of your withdrawal.

Cookies and Other Technologies

The Park Lane Group and our third-party service providers use a variety of technologies to assess how our website and/or mobile applications are used, to personalise your experience and to deliver you marketing, including online content, tailored to your interests. Some technologies we may use include the following:

Cookies

A cookie is a small file placed on your device when you visit a site that can be understood by the site that issued the cookie. We use the information collected by cookies to remember who you are to log you in and your preferences, to provide you advertisements, offers or other content tailored to your interests and to assess how our sites are used. You can accept or decline cookies through your browser settings. To learn more, please look at the cookie settings available in your specific web browser(s). Please note, however, that without cookies you may not be able to use all of the features of our Website or other websites and online services.

Other Technologies

In conjunction with gathering information through cookies, web beacons and Javascript, our web servers may log information such as your device type, operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. We also may record information such as the address of the web page that referred you to our Website and the IP address of the device you use to connect to our Website. We may log information about your interaction with the Website, such as which pages you visit. To control which web servers collect information by automated means, we may place tags on our web pages called "web beacons," which are small files that link web pages to particular web servers and their cookies. We also may send instructions to your device using JavaScript or other computer languages to gather the sorts of information described above and other details about your interactions with our Website.

We may use third-party web analytics services on our Website, such as those of Google Analytics. These service providers help us analyse how visitors use the Site. The information obtained for this purpose (including your IP address and other information collected by automated means) will be disclosed to or collected directly by these service providers.

The providers of third-party plug-ins and widgets on our Website, such as embedded videos and social media sharing tools, may use automated means to collect information regarding your use of the Site and your interactions with the plug-ins and widgets. We may also receive information you have made available to those third party services, including the geographic location of your mobile device and other information about you (such as name, email address, gender, locale, time zone, languages, social media profile URL, personal website URL, biographical information, birthday, photo, list of devices, education history, work history, hometown, interests, current city, political views, favourite athlete and teams, relationship status and information, religion, name of significant other, and certain security settings information) and your contacts on those services. This information is subject to the privacy policies or notices of the third-party providers of the plug-ins and widgets.

Traffic Data

We keep a record of traffic data which is logged automatically by our ISP's servers, and which we analyse. This includes your IP address, the URL you visited before ours, the URL you visit after leaving our site and which pages you visit on our site. We do not store or analyse this traffic data in a way that identifies you as an individual.

Internet-Based Marketing

You may receive interest-based marketing, offers or other content as you interact with websites or mobile applications. Interest-based Marketing is online Marketing from The Park Lane Group brands and/or from our carefully selected business partners that is tailored to your interests and sent to your device using a cookie or other identifier assigned to your device. These cookies or other identifiers are placed in general interest categories that we infer from information such as:

- The web pages you view and links you click on The Park Lane Group website and other websites you visit.
- Mobile applications you use.
- The Park Lane Group brand emails you view and links you click in the email.
- Demographic data.
- Offline and online purchase data.

We have designed our interest-based marketing systems to deliver such ads to you based only on data that does not personally identify you.

Links to Third Party websites, Apps and Social Media

The Park Lane Group website may provide links to other websites and apps for your convenience and information. These websites and apps may operate independently from us. Linked sites and apps may have their own privacy notices or policies, which we strongly suggest you review. To the extent any linked websites or apps are not owned or controlled by us, we are not responsible for their content, any use of the websites or apps, or the privacy practices of the websites or apps. We therefore encourage you to read the privacy statement of every site you visit.

Links to other websites and apps

Our website may provide links to other websites and apps for your convenience and information. These websites and apps may operate independently from us. Linked sites and apps may have their own privacy notices or policies, which we strongly suggest you review. To the extent any linked websites or apps are not owned or controlled by us, we are not responsible for their content, any use of the websites or apps, or the privacy practices of the websites or apps.

Social Networks and Third-Party Plug-ins

Our website may include plugins from social networks or other third parties. An example of a plugin is the Facebook "Like" button. Where legally permitted, these plugins may communicate with and send information to the party that provided the plugin, even if you do not click on the plugin. This information may include your IP address, information about your browser and device, and the address of the web page you are visiting on our site. Loading, using or clicking the plugins may also place, read and transmit cookies. These cookies may contain a unique identifier the social network or third party assigns to you. The loading, functionality and your use of the plugins are governed by the privacy statement and terms of the party that provided the plugin.

Social Network and Third-Party Login

Our website may allow you to log in using a social network or other third-party account. An example of a third-party login is “Log in with Facebook.” Logging into our website with your social network or other third-party account may allow us to gather information that you give us permission to access from that social network or third party. The login feature may also transfer information to the social network or third party, such as your username and password, to authenticate you. The social network or third party may also automatically collect information such as your IP address, information about your browser and device, and the address of the web page you are visiting on our site. The login feature may also place and read cookies from that third party that may contain a unique identifier the social network or other third party assigns to you. The functionality of and your use of the login is governed by the privacy statement and terms of the party that provided the login functionality.

User Generated Content

Please remember that any information you submit or post as user-generated content to Social Media sites become public information. You should exercise caution when deciding to disclose your personal, financial or other information in such submissions or posts. The Park Lane Group cannot prevent others from using such information in a manner that may violate this Privacy Statement, the law, or your personal privacy and safety. The Park Lane Group is not responsible for the results of such postings.

Information Security

The Park Lane Group is committed to keeping personal information secure. We have implemented technical, administrative and physical procedures designed to protect personal information from accidental loss, destruction, damage, misuse or alteration.

We limit access to personal information to those who have a business need. We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

Your information will only be stored within the UK and EEA.

Children’s privacy

Our website is not directed to children under the age of thirteen and we do not knowingly collect personal information from children under the age of thirteen on our website.

Updates to our Privacy Statement

We will post online any changes to this Privacy Statement and indicate the effective date when this Privacy Statement is updated. If we make any material changes to this Privacy Statement, we will notify you by sending an e-mail to the e-mail address you most recently provided us or by posting notice of the changes on our website www.parklanegroup.net.

For further information concerning what Personal Data we hold about you, how you can access it and our use of Personal Data generally, please contact our **Data Protection Officer** (see Section 1).

(4) FINDING OUT MORE

If you have any questions about our privacy statement or the information we hold about you, please contact us at registered address (see Section 1.)

Further information about data protection issues including the online Register of Data Controllers can be found at the Information Commissioner's website www.ico.org.uk.

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The England Information Commissioner's contact details are noted below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113
Email: casework@ico.org.uk

Complaints

Should you wish to complain about the use of your information and/or you consider that we have processed personal data in violation of applicable law, we would ask that you contact us to resolve this matter in the first instance please contact our **Data Protection Officer**:

via email to mail@parklanegroup.net

or

by post to **141-145 Bohemia Road, St Leonards On Sea, East Sussex, TN37 6RL.**

If you consider that we have processed personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with a supervisory authority e.g. the Information Commissioner's Office (whose contact details are noted above).