

PRIVACY POLICY

We ask that you read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide to you on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal information. This privacy policy supplements our other policies and is not intended to override them.

PURPOSE OF THIS PRIVACY POLICY

We value your privacy and are committed to protecting your personal information and to being transparent with you about the information we hold about you. Using your personal information allows us to develop a better understanding of our actual and prospective customers and the needs and concerns of anybody who may be interested in our design and development of homes or other persons who may come into contact with or are otherwise relevant to our work. This in turn this enables us to provide you with relevant and timely information about the work that we do.

Personal information also helps us as a housing developer to engage with current and potential buyers, local people, local business and individuals interested in Brick by Brick homes.

The purpose of this policy is to give you a clear explanation about how we collect and process your personal information. We may collect and or process your personal information through your use of our website or by an interaction with you by phone, by post, by email or other electronic communication or in-person in our sales suite or at events where we are attending or promoting the work of Brick by Brick the homes we build and the services we provide. This includes any personal information you may provide when you sign up to our e-newsletter(s), purchase a Brick by Brick home or sign-up to a particular product or service.

Our Philosophy

We have legal obligations to you which we will keep but our approach goes beyond this our attitude towards protecting your personal information is just as important. We want to get this right for you so if you think we have not met the standards of this policy please contact us so we can sort it out.

Our Promise:

- We promise to be careful and to have a system so that any personal information we hold about you is minimal, relevant and up to date;
- We promise to do our best to ensure that any contact we have with you is relevant to you and to the reasons that you provided the information to us in the first place;
- We promise that any general email will have an easy to see and use "unsubscribe" feature
- You can email us at any time directly to info@bxbdevelopment.com and ask to see what information we hold on you or to request that you are deleted from our database.
- We will remove your details within one working day of you requesting us to do so except where we are legally obliged to keep it.
- We will never sell your personal information to anyone.

Our Legal Obligations

We will use the information that we collect about you in accordance with:

- The Privacy and Electronic Communications (EC Directive) Regulations 2003
- The EU General Data Protection Regulation (Regulation EU 2016/679), ('GDPR') which becomes effective from 25 May 2018

The Detail

This policy explains:

1. Who we are
2. Information we may collect about you (this is what we mean when we refer to "personal information")
3. How we collect your personal information
4. How we may use your personal information
5. The very limited circumstances when we may disclose your personal information to third parties
6. Security of your personal information
7. How long we keep your data
8. Your legal rights
9. Notification of changes to our privacy policy
10. Contact details and further information

If you have any questions, please contact our Data Protection Officer at Brick by Brick using the contact details at the end of this policy.

1. WHO WE ARE

BXB is a multi-award winning housing development company established by Croydon Council.

Its official legal details are: Brick by Brick Croydon Limited

Company Number 09578014

Bernard Weatherill House, 8 Mint Walk, Croydon, London, CR0 1EA

We deliver properly designed homes for all tenures and are currently working on designing and developing thousands of new homes on multiple sites throughout the London Borough of Croydon. Our business model is designed to try to maximise the return from development activity to local residents, whilst also addressing housing need.

We have a small team of experts in the fields of design, development and finance who are committed to delivering innovative, exciting developments. We aim to deliver buildings which are beautifully designed inside and out, and create places where people want to live. Our relationship with our local community is very important to us so making sure we protect personal information given to us in accordance with the law and high standards is part of that.

2. INFORMATION WE MAY COLLECT ABOUT YOU

So when we talk about "personal information" this means any information about a living person from which that person can be identified. So it does not include data where your identity has been removed, i.e. anonymous data.

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **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 people use to access our website.
- **Profile Data** includes people's username and password, purchases or orders made by them, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how people use our website, products and services.
- **Email Communication Data** is emails between us and you, including when they were sent or received, whether they were opened, what links within them were clicked.
- **Marketing and Communications Data** includes people's preferences in receiving marketing from us and our third parties and your communication preferences. This also includes us

making a note of conversations we have had with them in person and/or communications you sent to Brick by Brick. This helps us to manage our relationship with them and ensures they only receive communications from us that are relevant and timely.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal information but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

When carrying out survey or equal opportunities activity we may collect a **Special Categories of Personal Data** about you (this may include details about your race or ethnicity, marital status, sexual orientation, criminal convictions and offences,). **This data is anonymised and not saved against your personal records.**

If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, you express an interest in buying one of our homes but you give us no means of contacting you and making sure you are the right person to send an email to). 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.

Users under 18

We understand that people aged under 18 may use this website. To request to see our safeguarding policy, please contact us using the contact details at the end of this policy.

3. HOW WE COLLECT YOUR DATA

We collect different information about you in a number of ways:

Information you give us

When you create an account on our website, buy a home, sign up to our e-newsletter, request marketing materials, give us feedback, we will store the personal information you give to us such as your name, email address, postal address, telephone number and card details.

Automated technologies or interactions

As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Information from third parties

We occasionally receive information about you from third parties as set out below:

1. Analytics providers such as Google
2. Advertising networks such as Facebook
3. Search information providers such as Google AdWords

4. HOW WE MAY USE YOUR INFORMATION

We will only use your personal information when the law allows us to.

Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the **contract** we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a **legal or regulatory obligation**.
- Where we have your explicit **consent** before using your personal information in that specific situation. However, generally we do not rely on consent as a legal basis for processing your personal information and you have the right to withdraw consent to direct marketing at any time by contacting us. You will find the relevant contact details at the end of this policy.

Purposes for which we will use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our **legitimate interests** are where appropriate.

Please note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
<p>Sales:</p> <p>To register you as a new customer, process and deliver a product or services purchase from us. This includes managing payments, fees and charges in order to fulfil, collect and recover monies owed to us.</p>	<p>(a) Personal data including contact and financial details provided by you to us</p>	<p>Performance of a contract with you.</p>
<p>Marketing and Communications:</p> <p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about our developments, community news, updates on the developments and any changes to a product or service you have inquired about.</p> <p>(b) Asking you to leave a review.</p>	<p>(a) Personal data including contact details from an enquiry or purchase of products or services from us.</p>	<p>Necessary for our legitimate interests to keep you informed about our products and services and to analyse/improve our products and services.</p>
<p>Marketing and Communications:</p> <p>If you opted in to hear from us we will keep you regularly updated about Shared ownership homes and Help to Buy and services.</p>	<p>(a) Personal data including contact details</p>	<p>You have consented to us getting in touch with you via post or email or other electronic means of communicating to keep you regularly updated about our product and services</p>

<p>Marketing and Communications:</p> <p>If you opted into hear from us about our private sale homes.</p>	<p>(a) Personal data including contact details</p>	<p>You have consented to us getting in touch with you via post or email or other electronic means of communicating to keep you regularly updated about our product and services</p>
<p>Business development:</p> <p>To administer, analyse and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) we will seek support and advice from third parties.</p>	<p>Personal data including contact details Usage data</p> <p>Data will be anonymised for analytical purposes.</p>	<p>Necessary for our legitimate interests as business to protect and analyse out services/output.</p>
<p>Business development:</p> <p>To use data analytics to improve our website, products/services, marketing and communications with you, customer relationships and experiences</p>	<p>Personal data including contact details Usage data</p> <p>Data will be anonymised for analytical purposes</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing and organisational strategies.</p>

<p>Public Safety:</p> <p>In order to protect us and users of the building we will record and store CCTV footage.</p>	<p>Footage inside and parameters of building</p>	<p>Necessary for our legitimate interests to keep people safe.</p>
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Marketing communications

We aim to communicate with you about the work that we do in ways that you find relevant, timely, respectful, and never excessive. To do this, we use data that we have stored about you, such as which events you have booked for in the past, as well as any contact preferences you may have told us about.

We will obtain consent for any electronic marketing communications to individuals.

We will use legitimate organisational interest as the legal basis for marketing communications by post. However, presently we do not carry out any postal marketing.

In the case of postal mailings, you may opt out of receiving these at any time by using the contact details at the end of this policy or update your contact preferences in your online account with us.

In the case of email, we will give you an opportunity to opt out of receiving electronic marketing communications during your registration with us. If you do not opt out, we will provide you with an option to unsubscribe in every email that we send you subsequently. Alternatively, you can use the contact details at the end of this policy or update your contact preferences in your online account with us.

As part of our service to you, separate to any marketing communications, we may contact you by email or telephone to provide essential information related to your purchase from us

Other processing activities

You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy.

5. DISCLOSURE OF YOUR DETAILS TO THIRD PARTIES

There are certain limited circumstances under which we may disclose your personal information to third parties. These are as follows:

- To our service providers who process data on our behalf and on our instructions (for example our Sales Team selling our homes is Red Loft). We require all third parties to respect the privacy of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes for us and in accordance with our instructions.
- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

We may share anonymised personal information with other organisations, particularly Red Loft, who use this to analyse our customer development programmes, generate sales to be able to sell homes to the right people in Croydon.

We do not sell personal details to third parties for any purpose.

6. SECURITY OF YOUR PERSONAL INFORMATION

Your debit and credit card information/ financial information

If you use your credit or debit card to purchase from us, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more information about this standard (https://www.pcisecuritystandards.org/pci_security/).

We store your card details safely for use in future transactions or any refunds required. This is carried out in compliance with PCI-DSS and in a way where none of our staff members can see your full card number. We never store your 3 or 4-digit security code.

Security of your personal information

We have put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same and that they will only process your personal information on our instructions. The third parties will also be subject to a duty of confidentiality.

We will not transfer, process or store your data anywhere that is outside of the European Economic Area, unless we have a contractual agreement in place that is of an equivalent standard to the GDPR.

7. DATA RETENTION

We will only retain your personal data 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.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal information, as follows:

a) Request access to your personal information

You have a right to request a copy of the personal information that we hold about you. Please use the contact details at the end of this policy if you would like to exercise this right, or any of the rights listed below. If you are a European citizen and consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK's supervisory authority, i.e. the Information Commissioner's Office.

b) Request correction of your personal information

You have the right to request that we correct the personal information we hold about you, although we may need to verify the accuracy of the new information you provide to us.

c) Request erasure of your personal information

You have the right to request that we delete or remove personal information where there is no good reason for us continuing to process it. Please note that we may not always be able to comply with your request for erasure if there are specific legal reasons- which will be notified to you at the time of your request.

d) Object to processing of your personal information

You have the right to object to the 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.

e) Request restriction of processing your personal information

You have the right to request that we 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.

f) Request transfer of your personal information

You have the right to request that the personal information we hold about you is transferred to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please note that this right only applies to automate information which you initially provided consent for us to use or where we used the information to perform a contract with you.

g) Right to withdraw consent

In circumstances where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. 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.

Please also note the following:

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 information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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. NOTIFICATION OF CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time. We will always try to communicate any changes to you where we have accurate contact details and where you would expect to receive communications from us

10. CONTACT DETAILS AND FURTHER INFORMATION

Please get in touch with us if you have any questions about any aspect of this privacy policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

Please also contact us if you have any questions about the information we hold about you, or to change your contact preferences with us:

Email us: info@bxbdevelopment.com

Call us: 0208 726 6000 ext 50032

Write to us addressed to: Bernard Weatherill House, 8 Mint Walk, Croydon, London, CR0 1EA

Data Protection Officer: Luke Chiverton