

## PRIVACY POLICY

### 1. Who we are

Shanly Homes (“we”, “us”, “our”) is committed to protecting your personal data.

This Privacy Policy is issued on behalf of the Shanly Group. For the purposes of this policy, when we refer to “Shanly Homes” we mean the relevant Shanly Group company responsible for processing your data in connection with the services or interactions described below (for example, property sales, lettings, property management, customer care or website enquiries). The Shanly Group includes Sorbon Group Limited, Shanly Residential Limited, Shanly Homes Limited, Sorbon Estates Limited, Sorbon Investments Limited, Milestone SO Limited and associated companies.

We are the data controller responsible for your personal data (or we act as a joint controller/processor, depending on the circumstances).

### 2. Contact details

Data Privacy Team – Shanly Group

Address: 24–26 Aylesbury End, Beaconsfield, Buckinghamshire, HP9 1LW

Email: [dataprivacy@shanlygroup.com](mailto:dataprivacy@shanlygroup.com)

Tel: 01494 671331

You can complain to the Information Commissioner’s Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk), but we would always appreciate the chance to resolve your concerns first.

### 3. What data we collect

We may collect and process the following categories of personal data:

**Identity data:** first name, last name, maiden name, title, date of birth, gender, username or similar identifier, marital status (where relevant).

**Contact data:** postal address and address history, email address, telephone numbers.

**Financial data:** bank account and payment card details; and where relevant salary, income and employment details, and information from credit reference or fraud prevention agencies and publicly available sources.

**Transaction data:** details of payments to and from you and details of products and/or services you have purchased from us (e.g. reservation, sale, letting or property management arrangements).

**Technical data:** IP address, login data, browser type/version, time zone and location setting, browser plug-ins, operating system and platform, and other technology on devices used to access our websites.

**Profile data:** purchases or orders, interests, preferences, feedback and survey responses.

**Usage data:** information about how you use our websites, products and services.

**Marketing and communications data:** your preferences in receiving marketing from us and communication preferences.

We also collect, use and share **aggregated data** (such as statistical or demographic data). Aggregated data is not personal data in law unless it can be linked back to you.

### **Special category data and criminal offence data**

We do not generally collect special category personal data (e.g. health, ethnicity, political opinions) or criminal offence data **unless required** to meet a legal obligation.

**Important exception:** where we are required to collect and share data in relation to social housing lettings and sales through **CORE** (Continuous Recording of social housing lettings and sales) for statistical purposes, that dataset may include sensitive information and (in some cases) special category data. This is handled as a statutory reporting obligation.

## **4. How we use your data**

We process your personal data only where the law allows us to. Most commonly we rely on:

- **Contract / pre-contract steps** (where we are entering into or performing a contract with you)
- **Legitimate interests** (where necessary to run our business, provided your rights do not override those interests)
- **Legal obligation** (where required by law/regulation)

### **Purposes, data types and lawful bases**

<b>Purpose</b>	<b>Type of Data</b>	<b>Lawful Basis</b>
Responding to enquiries (including email/website enquiries and requests for information about developments)	Identity, Contact, Technical, Usage	Legitimate interests (customer service and business operations) / Pre-contract steps
Deciding whether to enter into a contract with you (e.g. sale, letting, licence)	Identity, Contact, Financial	Pre-contract steps / Legitimate interests (risk management)
Registering you as a customer (including reservations)	Identity, Contact	Performance of a contract
Managing payments, fees and charges; collection and recovery of money owed (including tracing where relevant)	Identity, Contact, Financial, Transaction, Marketing & Comms	Performance of a contract / Legitimate interests (debt recovery)

<b>Purpose</b>	<b>Type of Data</b>	<b>Lawful Basis</b>
Managing our relationship with you (e.g. notices about terms/policy changes; asking for reviews/surveys)	Identity, Contact, Profile, Marketing & Comms	Performance of a contract / Legitimate interests (service improvement, record keeping) / Legal obligation (where applicable)
Customer care and aftersales (e.g. snagging, warranty/guarantee claims, maintenance requests for managed property)	Identity, Contact, Transaction, Profile	Performance of a contract / Legitimate interests (delivering services and resolving issues)
Administering and supporting new-build warranty/guarantee schemes (e.g. NHBC Buildmark and related processes)	Identity, Contact, Transaction	Performance of a contract / Legitimate interests (warranty administration) / Legal obligation (where applicable)
Fraud prevention and risk management (including credit checks/affordability decisions where relevant)	Identity, Contact, Financial, Transaction, Profile	Legitimate interests (protecting the business and customers) / Legal obligation (where applicable)
Prize draws, competitions, surveys	Identity, Contact, Profile, Usage, Marketing & Comms	Performance of a contract / Legitimate interests (insight and improvement)
Operating, administering and protecting our business and websites (IT, security, troubleshooting, testing, reporting)	Identity, Contact, Technical	Legitimate interests (IT and network security) / Legal obligation (where applicable)
Marketing communications about properties/developments where you have expressed an interest (and measuring effectiveness)	Identity, Contact, Profile, Usage, Marketing & Comms, Technical	Legitimate interests (direct marketing) / Consent (where required for specific channels or third party marketing)
Website analytics and improving user experience	Technical, Usage	Legitimate interests (improving our websites and services)

Purpose	Type of Data	Lawful Basis
Statutory reporting obligations (including CORE for relevant Milestone SO properties)	Identity, Contact and other required CORE fields	Legal obligation

**Marketing choices:** You can ask us to stop receiving marketing at any time by contacting [dataprivacy@shanlygroup.com](mailto:dataprivacy@shanlygroup.com).

## 5. Failure to provide data

If you do not provide information we need (by law or under a contract), we may not be able to perform the contract we have with you or are trying to enter into, and we may need to cancel or decline a service (we will tell you at the time if this applies).

## 6. Sharing data

We may share your data with trusted third parties where necessary, including:

- **Other Shanly Group companies** (where relevant to provide services and administer your relationship with us)
- **New home warranty providers** (e.g. NHBC) for Buildmark/warranty administration and related homeowner communications and surveys
- **Estate agents and solicitors** acting on our behalf in connection with property sales
- **Technology suppliers** supporting our websites and systems (your current policy names: *ContactBuilder, Clixifix*)
- **Customer satisfaction and research providers** (your current policy names: *In-house Research Ltd*)
- **External contractors** involved in customer care, snagging, warranty/guarantee works, maintenance and property management
- **Credit reference, debt collection and fraud prevention agencies** (where relevant)
- **Professional advisers** (lawyers, bankers, auditors, insurers)
- **Regulators and authorities** (e.g. HMRC and other statutory bodies where required)

We require third parties to protect your data and use it only for the purposes we specify. We do not sell your personal data.

## 7. International transfers

Because some of our technology providers use global cloud infrastructure, your personal data may be transferred outside the UK and/or EEA.

Where personal data is transferred internationally, we ensure appropriate safeguards are in place (for example, UK adequacy regulations and/or approved contractual protections) so your data remains protected.

## 8. Data security

We use technical and organisational measures to protect your data. Access is limited to staff and advisers with a need to know. Data transmitted online (e.g. by email) is never fully secure; please take care when sending information.

## **9. How long we keep your data**

We retain personal data only as long as necessary for the purposes set out above, including legal, accounting and reporting requirements.

Your current Shanly Homes retention rules can be kept exactly (and they're useful), so I've aligned them to the template:

- **Freehold purchase:** up to **12 years** from completion.
- **Lease/licence (residential or commercial):** until the earlier of lease/licence end or **12 years** from disposal of our interest in the property.
- **AML / statutory obligation data:** **5 years** (or longer if legally required).
- **Enquiries/requests for information about properties or developments:** until the earlier of erasure request or **2 years** from last contact.
- **All other cases:** as long as necessary to deal with enquiries, manage potential claims, and meet legal/regulatory requirements.

## **10. Your rights**

You have the right to:

- access the data we hold about you,
- request correction of inaccurate data,
- request deletion (where legally appropriate),
- object to processing (including for marketing),
- request restriction of processing,
- request transfer of your data to another party,
- withdraw consent (if we rely on it).
- complain to the ICO ([www.ico.org.uk](http://www.ico.org.uk)).

## **11. Data Subject Access Requests**

If you wish to exercise your right of access under data protection law (a "Data Subject Access Request"), please contact us at **dataprivacy@shanlygroup.com**. We may ask you to provide proof of identity before we can process your request. You are entitled to one copy of your personal data free of charge. For full details, please see our **Data Subject Access Request Policy**.

## **12. Links to other websites**

Our website may contain links to partner or third-party sites. These have their own privacy policies, and we are not responsible for them.

## **13. Changes to this policy**

We keep this policy under review. Updates will be published on our website. Please check back to stay informed.

<b>Version</b>	<b>Date</b>	<b>Review frequency</b>	<b>Next review</b>
1.1	22 <sup>nd</sup> December 2025	Annual	22 <sup>nd</sup> December 2026