

Privacy Policy

Mandale Homes (which is made up of Mandale Homes North Yorkshire Limited, Mandale Homes North Limited, Arkgrove Limited, Mandale Construction Limited and Mandale Construction North Limited) of Mandale House 5 Neville Road, North Tees Industrial Estate, Stockton-On-Tees, United Kingdom, TS18 2RD (**we, our or us**) are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, our buyers, tenants, customers, prospective buyers, tenants and customers and website users, will be processed by us.

1. **Controller**

Mandale Homes is made up of different legal entities and is part of the Mandale Group. More details of Mandale Homes can be found here: mandalehomes.com/why-mandale. This privacy policy is issued on behalf of Mandale Homes so when we mention "Company", "we", "us" or "our" in this privacy policy, we are referring to the relevant Mandale Homes entity as set out in section 10. The relevant entities within Mandale Homes are joint controllers of your personal data. Mandale Construction Limited is the company in Mandale Homes that takes overall responsibility for processing your data.

We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data protection manager using the details set out below.

2. **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our data protection manager in the following ways:

Full name of legal entity: Mandale Homes North Yorkshire Limited

Email address: harriet.spalding@mandale.com Postal address: Mandale Group, 5 Neville Road, North Tees Industrial Estate, Stockton on Tees, TS18 2RD

Full name of legal entity: Mandale Construction Limited

Email address: harriet.spalding@mandale.com Postal address: Mandale Group, 5 Neville Road, North Tees Industrial Estate, Stockton on Tees, TS18 2RD

Full name of legal entity: Mandale Construction North Limited

Email address: harriet.spalding@mandale.com Postal address: Mandale Group, 5 Neville Road, North Tees Industrial Estate, Stockton on Tees, TS18 2RD

Full name of legal entity: Arkgrove Limited

Email address: harriet.spalding@mandale.com Postal address: Mandale Group, 5 Neville Road, North Tees Industrial Estate, Stockton on Tees, TS18 2RD

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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.

3. **Purpose of this privacy policy**

This privacy policy aims to give you information on how Mandale Homes collects and processes your personal data through your use of this website, including any data you may provide through this website when you complete any of our enquiry forms, arrange to make a viewing, request a call back or request any information on a property.

This website is not intended for children and we do not knowingly collect data relating to children. It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you

so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

4. **Changes to our privacy policy**

We keep our privacy policy under regular review, any changes we may make in the future will be posted on this page and, where appropriate, notified to customers by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

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.

5. **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

6. **Information we may collect from you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you such as:

- **Identity Data** includes first name, last name, username or similar identifier.
- **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 you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions,

trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

7. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). 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.

8. 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 Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you, for example, enquire about a property and arrange a viewing; create an account with us; request a brochure; enter a promotion or survey; or give us some feedback.

Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [cookie policy](#) for further details.

Monitoring: We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

Credit checking: To enable us and other companies in our group to make credit decisions about you and for fraud prevention and money laundering purposes, we may search the files of credit reference and fraud prevention agencies (who will record the search). If you provide false or inaccurate information and we suspect fraud, we may record this.

9. How we use your personal data

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 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 obligation.

See clause 10 below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before 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.

10. Purposes for which we will use your personal data

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

Note that 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 where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Relevant entity
To register you as a new customer or buyer, or to register your interest as a potential customer or buyer.	(a) Identity (b) Contact (c) Profile	Performance of a contract with you (or expectation of a contract with you).	Mandale Construction North Limited Mandale Construction Limited Mandale Homes North Yorkshire Limited
To add you to our mailing list or to send you information we believe you will be interested in.	(a) Identity (b) Contact (c) Marketing and Communications (d) Profile	Legitimate interest to manage our relationships with customers, visitors & buyers	Mandale Homes North Yorkshire Limited Mandale Construction Limited
To manage the sale of a property to you, including: to manage all accounts payments, fees and charges; and to collect and recover money owed to us; and to complete your property warranty, utility and supplier agreements	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us) Necessary to comply with our legal obligations	Mandale Homes North Yorkshire Limited Mandale Construction Limited Mandale Construction North Limited
To manage our properties and developments	(a) Identity (b) Contact (c) Profile (d) Usage (e) Financial (f) Transaction	Performance of a contract with you and our legal obligation	Mandale Homes North Yorkshire Limited Mandale Construction Limited Mandale Construction North Limited
To manage our relationship with you which will include all customer care cases; (a) notifying you about changes to our terms or	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Usage (f) Transaction	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use	Mandale Homes Construction North Yorkshire Limited Mandale Construction Limited

<p>privacy policy; or sending service updates regarding our properties, developments, and services.</p> <p>(b) Asking you to leave a review or take a survey</p>		<p>our products/services)</p>	
<p>To respond to any website and telephone queries or complaints</p>	<p>(a) Identity (b) Contact (c) Financial (d) Usage (e) Marketing and Communications</p>	<p>Consent if you have asked us to respond, and for our legitimate interests to manage our relationships with customers, visitors and buyers.</p> <p>Legal obligation in respect of some complaints.</p>	<p>Mandale Construction Limited Arkgrove Limited Mandale Homes North Yorkshire Limited</p>
<p>To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage</p>	<p>Necessary for our legitimate interests, for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise.</p> <p>Necessary to comply with our legal obligations in running our business.</p>	<p>Mandale Construction Limited Arkgrove Limited</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical (g) Transaction</p>	<p>Necessary for our legitimate interests, to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy</p>	<p>Mandale Construction Limited Arkgrove Limited Mandale Homes North Yorkshire Limited</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage (c) Transaction</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</p>	<p>Mandale Construction Limited Arkgrove Limited</p>

		inform our marketing strategy)	
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	In some instances, this may be necessary for our legitimate interests, to develop our products/services and grow our business, and we may send you marketing information on this basis if you have given us your details in the course of a sale or pre-sale negotiations, and we are marketing similar products or services. We will give you the opportunity to opt out of marketing in every instance of contact. In others we will only send you marketing emails or communications if we have your consent.	Mandale Construction Limited Arkgrove Limited Mandale Homes North Yorkshire Limited

11. **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

12. **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased from us and you have not opted out of receiving that marketing.

13. **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

14. **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us using the contact details listed above.

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, product/service experience or other transactions.

15. **Cookies**

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website.

We use cookies to better the users experience while visiting the website. Cookies are small files saved to your computer's hard drive that track, save and store information about your interactions and usage of the website. This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will not store, save or collect personal information. You can read Google's privacy policy here for further information <http://www.google.com/privacy.html>.

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

16. **Change of purpose**

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

17. **Disclosures of your personal data**

We may need to share your personal information with any member of our Mandale Group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006. A full list of the Mandale Group of companies is [here](#).

We may share your personal data with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.

Third parties to whom we may choose to sell, transfer or merge all or part of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We may disclose your personal information to third parties in order to comply with any legal obligation, for example to local authorities, or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

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

18. **International Transfers**

We do not in the course of our standard business functions transfer your personal data outside of the UK.

19. **Data 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, and only authorised staff or third parties can access and use personal data. However, the transmission of information via the internet is not completely secure. 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.

20. **Data Retention**

We keep personal data in line with our following retention schedule.

We will only retain your personal data in an identifiable form for as long as is reasonably necessary for the purposes we collected it for, including to fulfil the purpose of satisfying any legal, regulatory, tax, accounting or reporting requirements. Once your personal data is no longer needed, it is deleted or anonymised in accordance with our data retention guidelines.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers, clients, suppliers and contractors for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Type of data	Retention Period	Reason for retention
Visitor Book	Destroyed weekly	Legal obligation with regards to health and safety monitoring
Complaints & responses	Retained for 8 years from date of first complaint, or until 1 year after NHBC or similar warranty expires, whichever is soonest	Information retained in case complaint is ever escalated with the warranty provider.
Accident books	10 years from date of accident	To ensure that records are kept in case of a back dated review

Telephone logs	max 3 months	To protect our and your interests
Property ownership and services responsibility database	10 years from completion of last unit on development	Service providers can currently back-charge up to 10 years of bills. To review this if legislation changes
Services responsibility forms	10 years from completion of last unit on development. Emails are archived after 18 months.	Service providers can currently back-charge up to 10 years of bills. To review this if legislation changes
Credit card payments	Credit card receipts are retained until no longer than 2 weeks. Electronic record retained for 6 years.	As long as necessary and in accordance with accounting record retention regulations. We are fully compliant with PCI DSS
Financial and accounting information, including purchase orders, invoices, remittances, receipts	6 years	In accordance with accounting record retention regulations.
Buyer details	Emails deleted as soon as details uploaded & sales enquiry form completed.	No retention
Sales progression database	6 years	In accordance with accounting record retention regulations.
Details from sales enquiry forms	After direct marketing is completed, information used is stored within direct marketing log on the server. Retained for 5 years from date of DM campaign.	In accordance with UK GDPR regulations
Web & telephone enquiries	Max 6 month retention	To ensure that customer care standards can be maintained and audited.
Sales Enquiry Forms	Destroyed once last plot on site has completed. (Purchaser enquiry forms retained in plot file)	To protect your interests and for the performance of a contract with you.
Plot file	3 years from completion of the last plot	To protect our & your interests
Tenant Database	For period of lease	So this can be referred to in case of any queries
Call reports	1 year	To review calls & customer service
Buyers contact details	Until warranty period has expired on last plot of that development	Customer service
Buyers snagging database	5 years from completion of last unit on development	Customer service and for record if any claims raised through warranty provider
Buyer correspondence	5 years from completion of last unit on development	Customer service and for record if any claims raised through warranty provider

21. Third Party Links

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

22. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to 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.

Request restriction of processing of your personal data. This enables you to ask us to 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.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Complain 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.

If you wish to exercise any of the rights set out above, please contact us.

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 could refuse to comply with your request in these circumstances.

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

23. Contact

Questions, comments and requests regarding this privacy policy are welcomed, please contact us at info@mandale.com

24. Glossary

Lawful basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Third Parties

Internal Third Parties

Other companies in the Mandale Group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

External Third Parties

Service providers acting as processors based in the UK who provide:

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; for example finance partners, warranty providers, and utility, interior or maintenance suppliers;
- Analytics and search engine providers that assist us in the improvement and optimisation of our website;
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you; and

- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Property management companies for the purposes of gaining contact information for matters relating to (but not limited to) service charge payments, directorships, shareholdings or any other shared or communal property related matters.