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Issue Date: 30.10.18

Privacy Policy Notice Morganstone Ltd (Registration No. 6705551)



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1. Introduction

We want to share with you how we treat personal data about you that we receive, including personal details such as your name, e-mail address, home address, work address and other information provided by you.

Morganstone is committed to upholding your privacy as a user, current or prospective client, supplier or employee of this website.

We collect information about you only if you voluntarily submit the information to us for purposes such as: -

- Registering your interest in recruitment opportunities (potential candidates).
- The delivery of design and construction works (clients/ purchasers/ tenants).
- Undertaking customer care works (purchasers/ tenants).
- Engagement of subcontractors, consultants and suppliers for the supply of services and products.

This privacy policy notice also details how we share your information and your rights relating to our use of your information.

2. Scope

This Privacy Notice sets out how we process your personal data. It applies to the information you provide via:

- (i) The Morganstone website (http://www.Morganstone.co.uk)
- (ii) Third party developers and housing associations.

This Privacy Notice is produced in line with the General Data Protection Regulations (GDPR) under which Morganstone is responsible for ensuring that: -

- you are provided with accurate information on the collection and processing of your personal data;
- your personal data is not processed unlawfully;
- your personal data is securely stored and protected;
- you may access your personal data.

3. About this Privacy Policy Notice

This notice sets out:

- What personal data we collect about you (<u>section 4</u>).
- How we obtain your personal data (section 5).
- How we use your personal data (section 8).
- How we protect your personal data (<u>section 9</u>).
- Who we share your personal data with (<u>section 10</u>).
- Where your personal data is stored (<u>section 12</u>).
- How you can access your personal data (section 15).
- Opting out of communication (<u>section 16</u>).
- Status of this Privacy Notice and updates (section 19).
- Privacy Questions (section 20).

4. What personal data we collect about you

You may provide us with some or all of the following personal data: -

Your first name and last name;

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- Your email:
- Your address:
- Your phone numbers;
- Your work email;
- Your work address:
- Your work phone numbers;

Morganstone will not intentionally collect or maintain, and do not want you to provide, any information classified as special data which may include ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, data concerning your health, data concerning your sex life and sexual orientation and biometric data.

5. How we obtain your personal data

Your information is collected from enquiry forms that are completed by you on our website and from information that is provided to us by third party developers/ clients and housing associations who we partner with in the design and construction of homes and commercial buildings.

6. Disclosure of information

Morganstone's use of your personal data for any of the purposes disclosed in this Policy, or any other purposes disclosed in any separate communication, may involve Morganstone sharing it with third party suppliers such as contractors, agents or professional advisers appointed by Morganstone to assist us in providing services, facilities and products.

Unless obliged to do so by law, Morganstone will not sell, rent, lease or otherwise share your personal data with third parties, unless you have provided your specific consent.

7. Photo and Video Disclaimer

Images may be captured during events organised and/or hosted by Morganstone using film photography, digital photography, video or other mediums. Morganstone reserves the right to use the images captured in any brochures, booklets, videos, websites or other media and publicity material produced by Morganstone.

Morganstone informs all persons taking part in an event that they may be photographed, filmed, videoed or otherwise captured in image form.

Unless express objections are received, individuals attending an event are deemed to have given their consent by attending or remaining at the event.

8. How we use your personal data, including sensitive data

Personal data about you provided to Morganstone will be used for the purposes described at the time of collection. It may also be used for the other purposes described in this notice.

We specifically use the data provided by you to:

- maintain and develop our relationship with you;
- communicate with you regarding any events or Morganstone related initiatives;
- progress and update you on the developments/ property in which you have expressed an interest;
- obtain your preferences on the products to be used in the build of properties;
- fulfil our contractual obligations in providing a customer care service through the defects period for properties.

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We may transfer your data to third-party affiliates or companies we contract with to conduct our business. This transfer will be undertaken in the pursuit of ensuring that the properties we build are in line with your requirements and expectations.

9. How we protect your personal data, including sensitive data

Morganstone has appropriate security and privacy controls to protect your data and to comply with applicable data protection law. Morganstone ensures that its IT infrastructure and systems used to store your information comply with high-standard, business grade specifications.

Despite the security measures employed by Morganstone, you should be aware that it is impossible to guarantee absolute security with on information sent through the Internet.

10. Who we share or disclose your personal data with

Your personal data will only be shared with third parties in accordance with this notice and to the extent permitted by applicable law.

Morganstone may share your personal data and information with third party organisation who undertake activities associated with the construction and maintenance of properties that have been built by Morganstone. These third-party companies are contractually bound to use your personal data that we share with them for the sole purpose of performing the services we have engaged them to provide under contract.

These companies may include but are not limited to:

- Sister companies in the interest of building properties and clarifying preferences.
- Subcontract companies for the purpose of undertaking construction work and maintenance works at properties.

We make the disclosures of your information described above to ensure the provision of excellent customer service and ensuring high quality standards throughout the build process.

All third-party organisations will be governed by strict adherence to the Morganstone Data Protection and Information Security Policy and a set of standard terms and conditions written to comply with GDPR.

11. Maintaining the information, we hold about you

Morganstone is committed to ensuring that the personal data it holds about you is accurate and up to date. If at any time you want to verify, update or amend any personal data we hold about you or if you become aware of possible errors or inaccuracies in that personal data, please contact us at systems@morganstone.co.uk.

12. Where your personal data is hosted

Data collected through the Website is stored on a database located within the EU/UK by a third-party service provider who manages our website.

All hard copy records are retained at Morganstone business premises where a high standard to security is ensured including key coded lockable offices and secure lockable cupboards.

Electronic records are stored on secure local servers stored at Morganstone head office. All Morganstone servers have robust security arrangements in place controlling access internally and prohibiting access from external third parties.

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We may store your information on third party data centres located both inside and outside the EU, where there is not a similar standard of data protection laws. If so, we will take steps to ensure that adequate levels of protection are applied to your information.

13. How long we hold your personal data for

Morganstone will retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained, but should be determined in a manner consistent with our data retention guidelines

14. How you can access your personal data

Under data protection laws, you have a right to:

- (i) request a copy of your information;
- (ii) ask us to make any changes to ensure that it is accurate and up to date;
- (iii) ask that we delete your information if we do not have a good cause to retain it;
- (iv) object to the way in which we use your information.

If you wish to exercise any of these rights, or if you have any questions about our use of your information, please email us at trudi.bowen@Morganstone.org.uk or write to Data Protection Officer, Morganstone Ltd, Unit 3 Llys Aur, Llanelli Gate, Llanelli SA14 8LQ.

15. How to complain

You also have a right to complain to the Information Commissioner's Office or other appropriate regulatory authority in relation to your information held by us, and how we use it (contact details can be found here www.ico.org.uk/).

16. Opting out of communication

You may at any time withdraw your consent to our use of your personal information for future marketing mailings or other non-essential purposes, at any time by e-mailing us at systems@Morganstone.co.uk.

17. Personal information from children

We do not knowingly collect personal information from children. The content of the website is not intended for, or directed to, children. If you are under 13 years of age or otherwise considered a minor under the laws of your country of residence, then please do not use or access the website at any time or in any manner. If a parent or legal guardian becomes aware that his or her child has provided us with personal information without their consent, please contact us. If we become aware that a user is a minor and has provided us with personally identifiable information without verifiable parental consent, we will delete such information from our databases.

18. Cookies

A cookie is a small piece of data that is sent from our web server to your browser when you visit www.morganstone.co.uk. It is stored on your hard drive to keep track of information needed by a site user as they travel from page to page within a website.

We use Google Analytics, which employs third party cookies, to measure and analyse visitor information related to our web site. For that purpose, your IP address, Internet traffic data and data on your browser type and PC are collected. We will not use any of this data to identify you personally, it is used only to monitor and improve morganstone.co.uk. Google's privacy policy is available by clicking the following link - Click here.

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19. Status of Privacy Notice and Updates

This notice is non-contractual. We reserve the right to amend it from time to time. Amendments will be posted to the Website and, where appropriate, through e-mail notification.

Unless otherwise specified all such changes will take effect immediately upon posting to the website.

For the avoidance of doubt, no change to this Notice will change the content of your consent that you may have granted.

20. Privacy Questions

If you have any questions or concerns about this Privacy Notice or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please contact: trudi.bowen@Morganstone.org.uk or

write to:
Data Protection Officer,
Morganstone Ltd,
Unit 3 Llys Aur,
Llanelli Gate,
Llanelli
SA14 8LQ.