



Robertson Residential Group Privacy Notice

For Prospective Customers and Customers

By: Louise M Garden

For: Robertson Residential Group

Status: Issued

Date: 11/10/2023

Document Classification: Confidential until published

Contents

1	Introduction.....	3
2	Definitions	3
3	What types of Personal Data do we collect about you?.....	4
4	Why do we collect your Personal Data.....	6
5	Using your Personal Data in accordance with Data Protection Legislation.....	7
6	Who do we share your Personal Data with?.....	8
7	How does Robertson Protect your Personal Data.....	10
8	How long does Robertson keep your Personal Data.....	10
9	How do we use your personal data and why?.....	10
10	Your rights in connection with your Personal Data?	13
11	How to Contact Us?.....	14
12	Transferring personal Data outside the UK.....	14
13	Automated Decision Making	15
14	Changes to this Privacy Notice	15

1 Introduction

Welcome to the Robertson Residential Group Privacy Notice ("**Privacy Notice**") for Customers and Prospective Customer ("**You**").

Robertson Residential Group Limited is a separate legal entity.

Robertson Residential Group Limited is the controller of your personal data and is responsible for handling it in accordance with Data Protection Legislation.

For the purposes of this Privacy Notice, the following Robertson Residential Group Companies may be controllers of your personal data in certain circumstances (when you visit their websites and formally request information or lodge interest in any of the services or plots which are offered).

- Robertson Homes Limited, SC151825
- Robertson Living Limited, SC565222

When we refer to "**we**", "**our**", "**us**", "**Robertson**" in this Privacy Notice, we are referring to the Robertson Residential Group Limited and to those companies noted above ("**Robertson Residential Group**"). The Robertson Group consists of two business groups with a range of companies as detailed on our website (<https://www.robertson.co.uk/legal>).

This Privacy Notice is for Customer and is split into sections depending on which service you request from us. **Please ensure you read the section that applies to you.**

Please see Section 2 for an explanation of the capitalised terms used in this Privacy Notice.

It is important that you read and retain this Privacy Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using such information and what your rights are under the Data Protection Legislation.

Our Contact Details

If you have any questions about this Privacy Notice or about how we handle your Personal Data, please contact our **Data Protection Officer** dpo@robertson.co.uk.

If you are unhappy with how we handle your Personal Data you can

- Submit a complaint to our Data Protection Officer dpo@robertson.co.uk, and/or
- Notify the Information Commissioner's office (ICO) by calling their helpline on 0303 123 1113

2 Definitions

"**Personal Data**" means, for this purposes of this privacy notice, any information identifying you as a specific individual. It can identify you directly from that information alone or indirectly in combination with other information we hold or can reasonably access. As well as identifying you as a specific individual, to be Personal Data, the data must also relate to you. Truly anonymous data is not Personal data

“Special Category Personal Data” means, for the purposes of this Privacy Notice, Personal Data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data, data concerning health or a natural person’s sex life, sexual orientation; or biometric or genetic data

“Data Protection Legislation” means the Data Protection Act 2018 (DPA 2018), the UK GDPR as referred to in section 3 (10) (as supplemented by section 205(4) of the DPA2018, any applicable legislation adopted by the United Kingdom post he United Kingdom ceasing to be a member State of the European Union; and/or any other applicable data protection legislation applicable in any part of the United Kingdom.

3 What types of Personal Data do we collect about you?

Robertson collect personal data in four main ways (outlined below)

A Information Collected through enquiries made to us

Robertson collects, processes, stores and uses, a range of Personal Data about you when you make an enquiry with us. This is information about you that you provide to Robertson by:

- Completing enquiry forms on our website or via social media such as Facebook;
- Making an appointment with us or visiting one of our site offices or developments;
- Otherwise corresponding or engaging with us by phone, email and messaging platforms

We may also collect your Personal Data via a third party provider, such as a property portal (for example Rightmove or Zoopla where you have sought information about any of our developments or new homes.

The personal data may include:

- Contact details; your name, preferred name, home address, email address, home and mobile telephone numbers, date of birth and gender
- Your status; for example, first time buyer house on the market, status of your current property,
- Information relating to your property preference (including particular developments or geographical location
- CCTV recordings, if you visit one of our sites or offices
- Financial status.

B Information collected through the reservation/purchase process

Robertson collects, processes, stores and uses a range of Personal Data about you if you go on to reserve or purchase a property. This includes:

- Contact details: your name, preferred name, home address, e-mail address, home and mobile telephone numbers, dates of birth and gender.
- Details of your bank account and national insurance number
- Copies of ID documents including birth certificate, passport and driving licences.
- Details of your occupation; this may include your work history
- Information relating to your property preferences.
- Advisors appointed by you including lawyers, financial advisors, surveyors
- Financial Details: financial position, budget, history, mortgage eligibility, applications, tax status.

- Property records, searches, documents and files relating to the sale to you and where you take part in a part exchange, files relating to the property you are selling us;
- Information collected from your completed Journey Checklist; and
- Copies of Mortgage statements, lender details

We might also collect, store and use the following Special Category Personal Data:

- Information about medical or health conditions which you provide us
- Information which you provide to us about vulnerable individuals

If you applied for a shared equity loan, Robertson may also collect and keep the Personal Data provided in your Loan Application, Reservation Agreement, Loan Agreement and any other Personal Data obtained from third parties such as credit reference and fraud prevention agencies.

C Information Collected when you read or download information from our website

Robertson collects, processes, stores and uses a range of Personal Data about you when you visit our website. This includes:

- Your anonymised IP address (this is the number that is automatically assigned to your computer and used to identify your computer each time you log into the internet)
- The type of browser, operating system and device used to access the website
- The date and time you access the website
- The pages you visit, and
- Information relating to whether you visited our website from another website and the address of such website

D Information collected when you raise a concern or complaint with us

Robertson collects, processes, stores and uses a range of Personal Data about you when you raise a complaint with us. This may include

- Contact details: your name, preferred name, home address, plot number, email address, home and mobile telephone number
- Gender and/or preferred gender
- Details of the service requested of Robertson, and
- The nature of the complaint

E Customer Aftercare

Once you have completed your purchase, Robertson provides customer aftercare to Robertson homeowners. To provide you with our Robertson Homeowners aftercare support we will collect, process, store and use a range of personal data about you, in addition to what we have set out above. This may include:

- Your plot number, site and address;
- Information provided by you as part of the Handover Day form;
- Information collected from you during your Home Demonstration visit;
- Details of any service requested of Robertson,
- Information you provide to us as part of any snagging exercise;
- Any information you provide to us as part of any home survey
- Any information you provide as part of your 10 year home warranty
- Any other information you provide to us in the process of providing to you the Robertson homeowners aftercare support.

4 Why do we collect your Personal Data

We will process your Personal Data in one or more of the following circumstances:

- To provide you with the services you have requested
- To keep you informed about relevant new homes and news;
- To send relevant advertising about our homes and services to you;
- For internal operations such as data analysis, statistical and survey purposes;
- To deal with any concerns or complaints you may raise; and
- If you go on to reserve or purchase a home from us, in order to fulfil our contractual obligations with you regarding the purchase of your home and any remedial works.

More specifically Robertson will use your personal data as follows:

A Information collected through enquiries made to us

The personal data collected from you is stored electronically and can be accessed by Robertson. Robertson will use your personal data in order to respond to your enquiry or otherwise to reply to the subject of the enquiry or email. If you attend an appointment with us, Robertson will use your Personal Data to provide you with the service requested during the appointment.

Robertson may use your Personal Data to let you know about the Robertson products, services, future developments or special offers which may be of interest to you. You must opt-in to be able to receive Robertson promotional information. Robertson will contact you with promotional information by SMS, e-mail and post **only** if you have given your consent for these forms of communication.

To opt-out of Robertson promotional communications which you receive by e-mail or text message you can unsubscribe at any time by clicking on the unsubscribe button on any e-mail communication, by speaking to one of the Robertson Sales Representatives or by e-mailing Robertson at sales@robertson.co.uk.

B Information collected through Telephone Calls

Robertson may monitor, record, store and use any phone calls made with you to check instructions given to us, for training purposes, compliance purposes or for crime prevention.

If recording has taken place, recorded phone calls are held securely by our call recording partner and will be deleted after 30 days unless Robertson is required to retain the recording for legal or regulatory reasons.

C Information collected through the reservation/purchase process

To comply with Robertson contractual obligations with you regarding the reservation and/or purchase of your home and any relevant remedial works, Robertson are required to process your Personal Data. This will include to comply with and facilitate the provision of warranties with a property purchased from us and any customer satisfaction surveys.

Throughout the reservation and/or purchase process, Robertson will communicate with you to advise of the build stage of your new home and any other relevant updates concerning your new home. The communications will take the form of a phone call, email or SMS message from Robertson Employees and/or automatic e-mail notifications sent by Robertson and may also include checklists completed by you and our customer care service teams on your journey in purchasing a Robertson home.

D Information collected when you read or download information from our website

The personal data collected from you when you visit our website assists us to ensure that the content from our website is displayed in the most effective way for the purposes of ensuring the security and protection of our systems and our information. In addition, Robertson may use your Personal Data to carry out analysis to make improvements to our website and services.

E Information collected when you raise a complaint with us

The personal data collected during the complaints process will be used to assist us in processing your complaint and to ensure we resolve the concerns you have raised.

Further information on the purposes for which we are processing or will process your Personal Data is attached in Appendix 1.

Please note that we do not in most instances require your consent to process your Personal Data where this is required or permitted by Data Protection Legislation or any other applicable law.

5 Using your Personal Data in accordance with Data Protection Legislation

We will only process your Personal Data where the law permits. Data Protection Legislation requires Robertson to have a lawful basis before processing your Personal Data. To process your Personal Data we rely on one or more of the following lawful bases:

1 Legitimate Interest

To process your personal data for the purposes described in this Privacy Notice and in order to process your Personal Data to provide you with the information you have asked for, and to send you additional marketing information in relation to your enquiry.

It is in our legitimate interest to collect your Personal Information as it provides us with the information we require in order to provide our services (e.g. information on houses we are developing or houses that or on sale) to you more effectively.

Robertson will always act reasonably and give full and proper consideration to your interests when balancing them against our legitimate interest and we will only process the minimum data required to achieve this legitimate interest.

2 Consent

We will only contact you in the ways in which you have consented to (for example, by way of e-mail). You can change your consent at any time by contacting sales@robertson.co.uk

3 Compliance with Legal Obligation

When you use our website, we will process your Personal Data to the extent that this is necessary for the performance of Robertson obligations under the law, for example for Health and Safety purposes.

4 Necessary for Performance of a Contract:

If you reserve or purchase a house with us, we may rely on this condition to process your Personal Data in relation to such reservation or purchase.

6 Who do we share your Personal Data with?

Your Personal Data may be shared within Robertson Residential Group and within Robertson Group Business units, business functions and Robertson employees.

We may also share your Personal Data with:

- Robertson suppliers, sub-contractors or agents to assist us in providing the service you have requested;
- Local Authority (for council tax purposes);
- Utility providers;
- Third party service providers (and their designated agents) for example to achieve and/or retain important industry relevant accreditations;
- Third party service providers to allow us to organise and run the business of Robertson Residential Group;
- Third parties who may be assisting us in our advertising, marketing, promotional and tendering activities;
- Third party organisations for the purposes of conducting onboarding reference and background checks
- Demographic data suppliers who help us understand the population of areas in which we are operating
- External Estate agents or Solicitors who may be acting on behalf of Robertson to sell homes on our behalf;
- Your solicitors for the purposes of progressing the sale or dealing with any issues you may have;
- External Estate Agents or Surveying Companies in order to value your current home for a part exchange against a new home (where requested by you)
- Independent Financial Advisors (for pre-reservations purposes);
- Warranty and insurance providers;
- National House building Council and similar organisations;
- External training providers;
- External IT Service providers;
- Where necessary with auditors;
- Subsidiary or parent companies of the Robertson Residential Group;
- Companies or organisations providing specific services to, or on behalf of Robertson Residential Group;
- Third parties who assist us in general advertising, marketing, promotional, tendering activities;
- Regulators, government departments, law enforcement authorities, tax authorities, professional advisors, financial institutions including but not limited to: Police Scotland, National Crime Agency, lenders, HMRC, UK Visas and Immigration Department, the Health and Safety Executive and other tax authorities; and
- Persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in the Robertson Residential Group business.

Role of Services Provider	Location of Service Provider	Safeguards put in place
Developer and hosting partner for robertsonhomes.co.uk website	UK	Processing data in the UK
Advertising	UK/USA	Enquiry details will be processed by Advertising social media and transferred to Robertson; appropriate data protection agreements in place with social media companies.
Analytics	USA	Processing of anonymised data; including anonymised IP address collected from your computer, type of browser, operating system and device used to access the website. No personal data transferred; processing is in the USA.
Form functionality integrated with website; plugin	UK/USA	Does not process personal data; data processing is through website platform
Chatbot functionality on site Data Storage and marketing communications	North America	Processing in the USA which is protected by Formal contract, Standard Contractual Clauses and an International Data Transfer Risk Assessment
3D walk throughs of properties	USA	Cookies and tracking pixels capturing information about your device and IP address, analytics; n/a
Services for marketing, analytics and metrics	UK	Data is held in the UK by supplier and by Robertson. Appropriate data protection agreements in place.
email	UK Data centre	Data is held in the UK; Appropriate data protection agreements in place
Warranty and Insurance provider	UK	UK data processing; Appropriate data protection agreements in place
Provision of IT infrastructure	UK	Infrastructure located in the UK; Appropriate data protection agreements in place
House building and accounting software	UK	Data processing on premise; Appropriate data protection agreements in place
Provide an app for purchasers after reservation keeping in touch with Robertson during the home build and configuration process	UK and US	UK and US based information; n/a

Website for choosing different finishes within your house; visualisation of environment	UK Based	Processing of personal choices information; Appropriate data protection agreement in place
Website platform	UK Based	Data is held in the UK; appropriate data protection contract in place

7 How does Robertson Protect your Personal Data

Robertson has put in place measures to protect the security of your Personal Data. It has internal policies, procedures and controls in place to try to prevent your Personal Data from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit the access to your Personal Data to those employees, agents, contractors and other third parties who have a business requirement to perform their job duties and responsibilities.

Where your data is shared with third-party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal data and to treat it subject to a duty of confidentiality and in accordance with Data Protection Law. We only allow them to process your Personal Data for specified purposes and in accordance with our written instructions and we do not allow them to use your personal data for their own purposes.

Robertson also has in place procedures to deal with a suspected breach and we will notify the Information Commissioner’s Office (or any other applicable supervisory authority or regulator) and you of a breach where we are legally required to do so.

8 How long does Robertson keep your Personal Data

Robertson will only retain your Personal Data for as long as it is necessary to fulfil the purposes for which it was collected and processed, including for the purposes of complying with any legal, tax, health and safety, reporting or accounting requirements.

We will only retain your Personal Data as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

In some circumstances we may anonymise your Personal Data so that it can no longer be identified. In this case we may retain such information for a longer period without further notice to you.

9 How do we use your personal data and why?

Generally we will use your Personal Data for the purposes of managing our relationship with you. We have set out in the table below further detail of the ways we plan to use your personal data and which of the Legal Basis and, if applicable, Additional Condition we rely on to do so. We have also identified what our Legitimate interests are where appropriate.

Processing Details

PROCESSING PURPOSES	TYPE OF DATA	LEGAL BASIS
<p>Goods and Services</p> <ul style="list-style-type: none"> - To execute a contract we enter into or propose to enter into with you. - To deliver our product and/or service to you. - To process or respond to your enquiry. - To comply with any contractual, legal or regulatory obligations. - To allow you to enter our premises or sites to provide our goods and services. 	<p>(I) Identity Data for example name, date of birth, address, copy of driving licence, national insurance number</p> <p>(II) Contact Data – for example address, email address, telephone number</p> <p>(III) Financial Data – for example bank account details and tax status</p> <p>(IV) Transaction Data for example mortgage statements, lender details</p> <p>(V) Other Data – for example information about your current house, requirements for new house, choices of finish</p>	<p>Contract</p> <p>Legal Obligation</p> <p>Consent</p>
<p>Marketing and Communication</p> <ul style="list-style-type: none"> - To provide you with information relating to products or services delivered by us. <p>To monitor the use of our platform to better understand its use and inform our services.</p>	<p>(I) Identity Data for example name, address, email address, telephone number</p> <p>(II) Marketing Data for example name, email address, telephone number</p>	<p>Our lawful basis differs depending on whether you are an individual consumer contact or a business contact</p> <p>If you are an individual consumer contact:</p> <ul style="list-style-type: none"> • For e-mail and texts we will ask for your prior consent to send this form of marketing materials, unless we are relying on the “soft opt-in” exemption. This

PROCESSING PURPOSES	TYPE OF DATA	LEGAL BASIS
<p>- To promote our business, product and/or service through advertising, marketing and promotional activities.</p>	<p>(III) Technical Data for example IP address of the device you use to contact us</p>	<p>exemption applies when you already receive services/goods from us and we send you information on similar goods/ services. This is because it is necessary for our legitimate interests (to develop our products/ services and grow our business).</p> <ul style="list-style-type: none"> • For telephone and postal marketing it is necessary for our legitimate interests (to develop our products/services and grow our business). <p>If you are a business contact, for all methods of contact it is necessary for our legitimate interests (to develop our products/services and grow our business)</p> <p>We are carrying out the necessary steps in relation to a contract to provide our services.</p>
<p>Cookies</p> <p>To collect internet traffic data and data regarding your browser type and computer.</p> <p>To look at how our platform is used. To monitor use of our platform so that we may better understand its use and inform our services.</p>	<p>See cookie policy for further information</p> <p>Cookies Policy - Robertson Homes</p>	<p>We are carrying out processing on the basis of your consent which you provide to us to process your data, unless the cookies are strictly necessary.</p>

PROCESSING PURPOSES	TYPE OF DATA	LEGAL BASIS
<p>Chatbot Service</p> <ul style="list-style-type: none"> - To implement and operate the Chatbot Service. - To store chat logs and ensure chat logs are kept in our secure inbox. 	<ul style="list-style-type: none"> (I) Identity data for example your name, address, postcode (II) Contact data for example your name, e-mail address and telephone number (III) Technical data for example the IP address of the device you are using to contact us (IV) Usage data for example how often you use the chat bot (V) Marketing & Communications data for example your name, e-mail address and telephone number 	<p>Consent</p> <p>Our chatbot is powered through cookies that you must accept to gain the functionality on the site. Detail on this can be found in our 'cookie policy link' (Cookies Policy - Robertson Homes)</p> <p>We will not use this information to send marketing emails, only to 'as fully as we can' answer your question(s) when contacting us through this service. Your chat log and details may be passed on internally where necessary to fulfil your chat request.</p>

10 Your rights in connection with your Personal Data?

It is important that the Personal Data that we hold about you is accurate and up to date. Please keep us informed if your Personal Data changes e.g., a change in contact details so that our records can be updated. Robertson cannot be held responsible for any errors in your Personal Data in this regard unless you have notified Robertson of the relevant change.

As data subject you do have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- **Request access to your Personal Data** – this is known as making a Subject Access Request and enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it
- **Request rectification of your Personal Data** – this enables you to have any inaccurate or incomplete Personal Data we hold about you to be corrected, although we may need to verify the accuracy of the new data you provide to us

- **Request the erasure of your Personal Data (known as the right to be forgotten)** – this enables you to ask us to delete or remove your Personal Data where there is no compelling reason for its continued processing e.g., it's no longer necessary in relation to the purposes for which it was originally collected. You have also 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 the local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Restrict the processing of your Personal Data** – this enables you to ask us to suspend the processing of your Personal Data, e.g., if you contest its accuracy and so want us to verify its accuracy.
- **Object to the processing of your Personal Data** – this enables you to ask us to stop processing your personal data where we are relying on the legitimate interest of the business as our basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground. 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.
- **Data Portability** – this gives you the right to request the transfer of your Personal Data to another party so that you can reuse it across different services for your own purposes.
- **Withdraw Consent** – you can 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. If you withdraw your consent, we may not be able to provide certain benefits, products or services to you. We will advise you if this is the case at the time you withdraw your consent.

11 How to Contact Us?

If you wish to exercise any of these rights in relation to the data held within your internal record, please contact sales@robertson.co.uk for any queries around sales and marketing preferences or the sales process; and/or dpo@robertson.co.uk if you wish to exercise your rights under data protection law.

We may need to request specific information from you in order to verify your identity and check your right to access the Personal Data or to exercise your rights. This is a security measure to ensure that your Personal Data is not disclosed to any person who has no right to receive it.

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 may refuse to comply with your request in these circumstances.

If you believe that Robertson has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the supervisory authority for data protection issues.

12 Transferring Personal Data outside the UK

We transfer data outside the UK where our service providers host, process or store data outside the UK. Where we do this, we will ensure that the transfer is to a country covered by a decision of the ICO or is otherwise made in circumstances where we have put appropriate safeguards in place to protect your data in accordance with the Data Protection Legislation (such as the International Data Transfers Agreement).

Where we organise international data transfers on your behalf we may be required to provide information to providers and government bodies based out with the UK.

13 Automated Decision Making

Automated decision making occurs when an electronic system uses your Personal Data to make a decision without human intervention. **We do not envisage** that any decisions will be taken about you based solely on automated decision making, including profiling. However, we will notify you in writing if this position changes.

14 Changes to this Privacy Notice

Robertson Residential Group reserves the right to update or amend this privacy notice at any time including where Robertson intends to further process your Personal Data for a purpose other than that for which the Personal Data was collected or where we intend to process new types of Personal Data. You should check this web page regularly in order to be aware of these changes as they may affect you.

This Privacy notice is subject to regular review and was last updated on 11/10/2023