



JP Whelan Homes Limited is committed to protecting your privacy when you buy from us, visit our website ["Site"] or use our services.

Any personal data collected through the Site will be treated as confidential in line with the principles of The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union. When the GDPR takes effect on 25th May 2018, it will replace the 1995 Data Protection Directive (Directive 95/46/EC). It was adopted on 27 April 2016. Should you have any queries regarding the general data protection regulation please visit the ICO, Information Commissioner's Office website <https://ico.org.uk/> or contact us at office@jpwhelanhomes.co.uk.

JP Whelan Homes Limited collects information when you read or download information from the Site (IP Addresses and Cookies)

We will collect information generated by your visit to the website. This may include your IP Address (an IP address is a number that is automatically assigned to your computer whenever you are surfing the Internet); the type of browser and operating system used to access the Site; the date and time you access the Site; the pages you visit; and if you visited the Site from another website, the address of that website.

Some of this information may be stored on your computer in the form of a cookie. This information helps the web server track such things as your preferences and any data you submit while browsing the Site. For example, the cookie will store login details and information relating to your JP Whelan Homes Limited user preferences, if applicable.

Most web browsers automatically accept cookies, but you can adjust your browser to prevent this. However, please note that if you deactivate cookies you may not be able to use all the functions on the Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Site.

For further information about cookies and how to manage your cookies, please visit www.allaboutcookies.org. This link is to another website and is opened in a new window. JP Whelan Homes Limited is not responsible for the content of the www.allaboutcookies.org website.

Privacy Notice

The Privacy Notice below explains how we use information about you and how we protect your privacy.

We have a Data Protection Officer who makes sure we respect your rights and follow the law. If you have any concerns or questions about how we look after your personal information, please contact the Data Protection Officer at office@jpwhelanhomes.co.uk.

Changes to Privacy Notice

Any changes we make to our privacy policy in the future will be posted on this page. You should check this page regularly in order to be aware of these changes, as they may affect you.

Why we collect your personal information

Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can then identify a person.

Information we may collect about you may include (but is not limited to):

- i. Name;
- ii. Address;
- iii. Telephones numbers;
- iv. Email addresses;
- v. Identification documents;
- vi. Computer IP address.

Why do we need your personal information?

We may need to use some information about you to:

- i. provide marketing material;
- ii. deliver services and support to you;
- iii. manage those services we provide to you;
- iv. service improvement
- v. check the quality of services;
- vi. help with research of new services.

How the law allows us to use your personal information

There is legal reason why we need to collect and use your personal information. Generally, we collect and use personal information for the purposes of where:

- i. you are entering or have entered into a contract with us;
- ii. you, or your legal representative, have given consent;
- iii. it is necessary for legal cases;
- iv. it is necessary for research purposes.

Consent and Your Preferences

We would like to occasionally send you information on products and services we offer, and which we think will be of interest to you. We will ask for your consent to communicate this type of information to you, you can remove your consent and ask us to stop.

If you do not want to sign up for an online account but you want to remove your consent, please contact office@jpwhelanhomes.co.uk or unsubscribe and tell us which service you are removing your consent so we can deal with your request.

We only use what we need

Where we can, we'll only collect and use personal information if we need it to deliver a service.

If we don't need personal information we'll either keep you unsubscribed if we already have it for something else or we won't ask you for it. For example, in a survey we may not need your contact details so we'll only collect your survey responses.

We won't sell your personal information to anyone else.

We will always provide an option for updating your user preferences on our communications with you.

Visiting our website

When you visit our website, we collect standard internet log information for statistical analysis.

We use cookies to collect information in an anonymous way, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. We do not make any attempt to identify visitors to our websites. We do not associate information gathered from our sites with personally identifying information from any source.

When we collect personal information, for example via an online form, we will explain what we intend to do with it.

Our website contains links to various third party websites. We are not responsible for the content or privacy practices of any external websites that are linked from our sites.

Improvements to our website

JP Whelan Homes Limited is committed to providing the best service and information possible to you. We are therefore continually seeking ways of improving and upgrading the Site and reserve the right to make changes to the Site and the way we process information collected from it. JP Whelan Homes Limited is nevertheless committed to continue to respect the privacy and preferences of all users of this Site.

How we use your telephone number and email address

Text messages and contact via telephone or email provide a direct way to contact and share information with you about our developments we can deliver to you.

If you provide your telephone number or email address we may keep in contact with you by these methods.

Operational SMS/text/email messaging and calls

If you supply us with your telephone or email contact details, we may use them to call.

Examples of operational text messages include:

- i. Confirming a repair and/or a time and date for a repairs contractor to visit;
- ii. Confirming a home visit;
- iii. Sending a reminder about an appointment;
- iv. Asking you to contact a named person or department;
- v. Satisfaction surveys.

Sharing your telephone number with third parties

We may pass your telephone number to third parties so that we can meet our contractual obligations with you. We may also share your telephone numbers if we are required to by law.

We may supply the details to our approved third party contractors who are delivering or performing services on our behalf, and these companies must not use your information for any other purpose. We never share or sell your telephone numbers to telesales/marketing companies.

Who do we share your information with?

We use a range of organisations to either store personal information or help deliver our services to you. Where we have these arrangements, there is always an agreement in place to make sure that the organisation complies with data protection law.

We are likely to share your personal information with the following:

- *Property Services and Repairs*

Contractors and third party supply chain service providers for the purposes of carrying out property related inspections and repairs. Generally we will only share your name, the property address and your contact details so that they can arrange an appointment with you. In some cases we may also share customer service information with them, for example where you have told us that you need longer to answer your door. We may also need to share information where we have recorded there is a potential risk to operatives or other representatives.

- *Legal Services and Partners*

We may share your personal information with our legal services or solicitors if we are preparing or defending a legal claim.

Sometimes we have a legal duty to provide personal information to other organisations; this is often because we need to give that data to the police, courts, local authorities or government bodies.

We may also share your personal information when we feel there's a good reason that's more important than protecting your privacy. This doesn't happen often, but we may share your information:

- i. in order to detect and prevent a crime and fraud; or
- ii. if there are serious risks to the public, our staff or to other professionals.

Keeping your information secure

We store personal information both electronically and in paper form.

We implement security policies, processes and technical security solutions to protect the personal information we hold from:

- i. Unauthorised access;
- ii. Improper use or disclosure;
- iii. Unauthorised modification;
- iv. Unlawful destruction or accidental loss.

We'll do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we'll only make them available to those who have a right to see them. Examples of our security include:

- i. Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password);
- ii. Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it;
- iii. Training for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong;
- iv. Regular testing of our technology and ways of working including keeping up to date on the latest security updates.

Employees and third parties who have access to, or are associated with the processing of, your personal information are obliged to make reasonable efforts to safeguard it.

Information collected by CCTV

JP Whelan Homes Ltd uses CCTV for the purposes of security, crime detection and public safety at its developments and offices. CCTV information is processed by a third party contractor who we require to be GDPR compliant. CCTV images are not normally retained beyond a period of 1 month.

Information Storage

The majority of personal information is stored on systems in the UK. But there may be some occasions as our technology services progress where your information may leave the UK either in order to get to another organisation or if it's stored in a system outside of the EU.

We will always have additional protections on your information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.

We'll take all practical steps to make your personal information is not sent to a country that is not seen as 'safe' either by the UK or EU Governments.

How long do we keep your personal information?

There's often a legal or a contractual reason for keeping your personal information for a set period of time. We will keep your information for the duration of providing a service, after that time we will either anonymise or destroy your information.

You can ask us for confirmation of our retention periods by contacting us at office@jpwhelanhomes.co.uk

Your Rights

The law gives you a number of rights to control what personal information is used by us and how it is used by us.

You can ask for access to the information we hold on you

You have the right to ask for the information we have about you. When we receive a request from you in writing, we must give you access to what personal information we've recorded about you.

However, we can't let you see any parts of a record which contain:

- i. confidential information about other people; or
- ii. may be held in preparation to defend legal claims.

This applies to personal information that is in both paper and electronic records. If you ask us, we'll also let others see your record (except if one of the points above applies).

A request for personal information can be made via email or in writing. This is known as a subject access request. In order to make a subject access request you will need to provide the following information:

- i. your name;
- ii. your address;
- iii. proof of identity and signature;
- iv. enough information to identify your records.

What types of documents could I submit as proof of ID?

- Copy passport with signature (please remove your passport number);
- Copy driving license picture with signature (please remove your driver number);
- Copy of signed tenancy or contract with us.

You can write to us at the following address:

Data Protection Officer
JP Whelan Homes Limited
Norheads House
Glovers Close
Biggin Hill
Kent
TN16 3GA

Alternatively email us at office@jpwhelanhomes.co.uk. (Please ensure you attach your identity documents with the document reference numbers removed).

We will not start your subject access request until we are satisfied that you have provided us with enough information for us to identify you.

Once you have made a request you will receive an acknowledgement and your request should be answered within one month. In certain circumstances, we are allowed to take longer but we will tell you if we feel we may need longer without undue delay from when we receive your request.

If you can't ask for your records in writing, we'll make sure there are other ways that you can. If you have any queries about access to your information please contact office@jpwhelanhomes.co.uk or call 01959 578120.

You can ask to change information you think is inaccurate. You should let us know if you disagree with something we may have recorded about you. We may not always be able to change or remove that information but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

Please email office@jpwhelanhomes.co.uk to inform us of any inaccuracies.

You can ask to delete information (right to erasure)

In some circumstances you can ask for your personal information to be deleted, for example:

- i. where your personal information is no longer needed for the reason why it was collected in the first place;
- ii. where you have removed your consent for us to use your information (where there is no other legal reason us to use it);
- iii. where there is no legal reason for the use of your information;
- iv. where deleting the information is a legal required;
- v. where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure.

You can ask to limit what we use your personal data for

You have the right to ask us to restrict what we use your personal information for where:

- i. you have identified inaccurate personal information, and have told us of it;
- ii. where we have no legal reason to use that information but you want us to restrict what we use it for rather than erase the information altogether.

We will assess whether you have a right to a restriction and where restriction of use has been granted, we'll inform you before we carry on using your personal information.

Where possible we'll seek to comply with your request, but we may need to hold or use information because we are required to by law or we have a legal basis to do so, such as a contract.

You can ask to have your information moved to another provider (data portability)

You have the right to ask for your personal information to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

However, this only applies if we're using your personal information with consent (not where we are processing your personal information for contractual, legal obligations or vital interests as a legal basis) and if decisions were made by a computer and not a human being.

It's likely that data portability won't apply to most of the services you receive from JP Whelan Homes Limited.

How to tell us of a data breach

JP Whelan Homes Limited takes responsibility to protect the personal information we hold about those with whom we work seriously. We are accountable for our processing and take necessary technical and operational steps to information security protections.

If you suspect your personal information or that of others may have been at risk of a data protection breach please contact us on 01959 578120 or at office@jpwhelanhomes.co.uk.

The details above have been made available to everyone with whom we deal so that customers, employees and supply chain processors can tell us without undue delay of potential or actual breach.

Where can I get advice?

If you have any questions about how your personal information is handled please contact our Data Protection Officer at office@jpwhelanhomes.co.uk

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO)

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively visit www.ico.org.uk or email: casework@ico.org.uk.