

Lovell Partnerships Limited – Privacy Notice

INTRODUCTION

Lovell Partnerships Limited is committed to protecting and respecting your privacy. When we say “we”, “our”, “us” or “Lovell Partnerships” in this privacy notice, we are referring to Lovell Partnerships Limited (trading as Lovell Homes) (which is part of the Morgan Sindall group of companies) and includes all or any of the entities that make up the Lovell Partnerships group of companies as the context requires, including management companies under our control.

Lovell Partnerships is classed as the “data controller” of your personal information. Our registered office address is at Kent House, 14-17 Market Place, London W1W 8AJ.

This privacy notice explains how we collect your personal information, what we do with it and your rights in respect of it. We have a separate [Cookie Policy](#) that sets out similar information relating to the cookies and other technologies that we use.

The information security team of our parent company Morgan Sindall Group plc oversees our compliance with data protection laws and this privacy notice and provides guidance and advice to us and acts as our data protection officer.

Please direct any complaint or query relating to how we have processed your personal information to gdpr@morgansindall.com or to the Head of Information and Security, Morgan Sindall Group, Kent House, 14-17 Market Place, London W1W 8AJ.

WHOSE PERSONAL INFORMATION DO WE PROCESS AND HOW DO WE COLLECT IT?

We collect and process the personal information of:

- our customers and third parties engaged by our customers (such as their conveyancing solicitors);
- residents and tenants of properties where we do works or providing services;
- potential customers and members of the public who are not customers, such as those who use our website and online services, make enquiries about our homes and ask to receive information from us;
- consultants, contractors, service providers and others involved in the services that we carry out for our customers or engaged by us to support the services that we provide and/or to provide services to us.

We have a separate privacy policy for our people and for those who apply for a job or work placement with us.

We collect your personal information from:

- you directly;
- someone else acting on your behalf who gives us the information directly;
- third parties such as the NHBC (the National House Building Council) and property search websites; and
- registered housing providers, government and law enforcement agencies.

If you are purchasing a Lovell home jointly with somebody else, you must ensure that you have permission from the other person before sharing information about them with us.

HOW YOUR PERSONAL INFORMATION IS USED

This section explains how we process your information depending on the context of how personal information comes into our care and includes information about the legal basis that we rely on in those circumstances. For more information on the basis for processing see “[Lawful basis for processing](#)” below.

We use information held about you to:

- provide our services;
- carry out feedback and research on our services; and
- notify you about our services and/or changes to our services.

Set out below in a table format is a description of all the ways we may use your personal data and which of the legal bases we rely on to do so, depending on who you are. We have also identified what our legitimate interests are where appropriate. We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

We never sell your data to third parties or allow third parties to contact you without your permission.

We share your data with third parties where there is a legal obligation for us to do so or we have identified a valid lawful basis as set out in the tables below. We may process your personal data without your knowledge or consent where this is required or permitted by law.

OUR CUSTOMERS

Legal Basis for processing -

Our legitimate interests, on the basis that processing is necessary in order to enter in to and perform our contract with you (see "[Lawful basis for processing](#)").

Types of personal data -

We collect and use the following personal information:

- name, address, telephone number and email address;
- the address of the property that you are buying;
- your communication/contact preferences;
- information about you that you share with us, such as your proposed deposit, if you are a first time buyer, if you will be using the Help-to-Buy scheme, your family situation, your proposed mortgage term and how much you would like to borrow;
- your username and password to our customer portal (if applicable);
- details of purchases made by you; and
- your preferences, feedback and survey responses.

The personal information we have is also made up of what you tell us, data we collect when you receive our services and information that we learn from you or from outside organisations that we work with.

Use -

We will use the information you provide to:

- follow up a visit to a marketing suite;
- communicate with you to provide you with information about your new home and to respond to your queries;
- communicate with you to provide you with information about our services and to respond to your queries and provide you with information about offers, where appropriate;
- progress the purchase of your new home from us and our services to you and comply with our legal obligations;
- refer you (with your express permission) to an independent financial advisor;
- ask for your feedback, assess customer service and satisfaction and to improve services;
- handle any complaints or claims made by you;
- create a user account for access to specific services, such as allowing you to confirm choices for your new home through our customer portal;
- if applicable, administer your account with the relevant management company for your development and/or on behalf of the relevant freehold owner if you have purchased a leasehold interest, including in respect of the collection of ground rent and/or service charges (see below "[Management companies](#)"); and
- if you consent, keep you informed of Lovell news and services, follow up on your visits to our show homes and marketing suites and for other marketing purposes (see below under "[Marketing to customers & non-customers](#)").

Disclosure -

We will share your personal information with:

- service providers who assist us to provide our services to you (such as our IT service providers, our website provider and customer survey provider, also our contractors and subcontractors who we may ask to come and perform works and services in your property after you have bought it);
- third parties who you nominate to process and store your personal information (e.g. your conveyancing solicitor and your mortgage provider);
- Homes England or Help to Buy (Wales) or Help to Buy (Scotland), where applicable to Help-to-Buy;

- the relevant registered housing provider, where applicable to shared ownership purchases and properties;
- the NHBC (the National House Building Council) or other similar providers for the purposes of your new home warranty;
- the relevant residents' management company for your property/development and/or any property management service provider appointed in respect of your property/development;
- analytics and search engine providers that assist us in the improvement and optimisation of our websites;
- our professional advisers, claims handling agencies and/or debt recovery agencies;
- crime and fraud prevention agencies and organisations, where requested by that organisation;
- law enforcement, taxation, legal or government authorities, where requested by that organisation; and
- any member of the Morgan Sindall Group plc group of companies.

If you wish to update your personal information or your communication preferences, you can do so at any time by contacting us by email at sales.tamworth@lovell.co.uk or by post to Sales Team, Lovell Partnerships Ltd, Marston Park, Tamworth, Staffordshire, B78 3HN.

MARKETING TO CUSTOMERS & NON-CUSTOMERS

We may use personal information to make decisions about what products, services and offers we think you may be interested in and to let you know about those products, services and offers that may be of interest. This is what we mean when we talk about 'marketing'.

If you do not wish us to continue to use your information in this way, you can let us know by following the unsubscribe instructions on any marketing communications sent to you. You can also exercise this right at any time, update your contact details and/or change your marketing preferences by contacting us by email at marketing@lovell.co.uk or by post to National Marketing Co-ordinator, Lovell Partnerships Ltd, Marston Park, Tamworth, Staffordshire, B78 3HN.

Legal Basis for processing -

Consent (see below "Your Rights")

Types of personal data -

We collect and use the following personal information:

- name, address, telephone number and email address;
- where relevant, the address of the property that you are buying;
- your communication/contact preferences;
- information about you that you share with us, such as your current status, proposed deposit, if you are a first time buyer, if you will be using the Help-to-Buy scheme, your family situation, your proposed mortgage term and how much you would like to borrow;
- your interests, preferences, feedback and survey responses; and
- technical and usage data, including internet protocol (IP) address, your login data, browser type and version and information about how you have used or responded to our website and marketing services.

The personal information we have is also made up of what you tell us, data we collect when you use our services and information that we learn from you or from outside organisations that we work with.

We may receive your initial enquiry through a property portal or website such as Rightmove or Zoopla if you have interacted with a message sent to you by that portal or website or in respect of information published on that portal or website. If you have completed a contact request form, asked for more information and/or asked to have an enquiry sent to us, we receive your information in that way.

Use -

We will use the information you provide to:

- respond to requests for brochures, information or to answer your enquiries;
- show or send marketing material online (on our own and other websites including social media), in our own and other apps, or by email, mobile phone, post or through smart devices and other digital channels;
- follow up a visit to a marketing suite;

- carry out customer satisfaction surveys;
- keep you informed of Lovell news and services;
- help us improve our service and our communications to you, for example to find out when you may wish to move forward with a purchase of a property so that we can contact you at the appropriate time;
- track emails to help us improve the communications we send. We use small images called pixels within our emails to tell us things like whether you opened the email, how many times and the device you used. We may also set a cookie to find out if you clicked on any links in the email. To find out more about how we use cookies and email tracking, please see our [Cookie Policy](#);
- register your name and address on our website (if you complete a registration); and
- create a user account for access to specific services relating to any of the above on our website.

We study the information to form a view on what we think you may want or need, or what may be of interest. This is how we decide which products, services and offers may be relevant. This is called profiling for marketing purposes. You can contact us at any time and ask us to stop using your personal information this way.

What you get will depend on the marketing and communication choices that we hold. You can change these at any time and tell us to stop sending you sales and marketing information.

We may also ask you to confirm or update these choices from time to time. We will also ask for marketing choices to be confirmed or updated if there are changes in the law, regulation, or the structure of our business. With any option, if you are a customer, we will still send other important information relating to our homes, such as changes to existing products and services that are relevant to you as our customer (see section above for [“Our customers”](#)).

Where you have submitted your details via the online valuation tool or sign-up form on [propertypriceadvice.co.uk](#), data is also stored within our email marketing system, either on a current contact list or within a suppression list to prevent future sends to users who have unsubscribed or provided an invalid email address.

Disclosure -

We will share your personal information with:

- service providers who assist us to provide our marketing services to you, such as our website provider, our marketing services provider and our customer survey providers;
- analytics and search engine providers that assist us in the improvement and optimisation of our websites and digital communications;
- our professional advisers;
- crime and fraud prevention agencies and organisations, where requested by that organisation;
- law enforcement, taxation, legal or government authorities, where requested by that organisation; and
- any member of the Morgan Sindall Group plc group of companies.

RESIDENTS AND TENANTS

Legal Basis for processing-

Legitimate interests, on the basis that processing is necessary in order to perform our contract with you (or with your landlord), where you are the owner, resident or tenant of a property that we are responsible for maintaining and/or repairing for a period of time (see [“Lawful basis for processing”](#)).

Types of personal data -

We collect and use the following personal information:

- your name, address, telephone number and email address;
- the services that we have provided to you when you have connected us and when we have contacted you;
- your communication/contact preferences; and
- information about you that you choose to share with us that may help us to provide our services to you, including your family situation.

The personal information we have is also made up of what you tell us, data we collect when you use our services and information

that we learn from you or from outside organisations that we work with (such as your landlord, if applicable). We may receive your name and contact details from your registered housing provider or landlord. We need this information to be able to contact you to arrange access to your home to carry out necessary repairs or other services.

Use -

We will use the information you provide to:

- provide our services to you and your property and comply with our legal obligations;
- communicate with you to provide you with information about our services and to respond to your queries;
- ask for your feedback, assess customer service and satisfaction and to improve overall operations; and
- handle any complaints or claims made by you.

From time to time we may track emails to help us improve the communications we send. We use small images called pixels within our emails to tell us things like whether you opened the email, how many times and the device you used. We may also set a cookie to find out if you clicked on any links in the email. To find out more about how we use cookies and email tracking, please see our [Cookie Policy](#).

Sometimes we may ask third party market research firms to get in touch with you on our behalf to ask you for your opinions and feedback. Sometimes these firms will combine what you tell them with data from other sources to study it. They will use this to produce reports and advice that help us understand our customers' point of view, so that we can improve the way we work as a business.

Disclosure -

We will share your personal information with:

- service providers who assist us to provide our services to you (such as our out of hours aftercare helpline service provider and our contractors and subcontractors who we ask to come and perform works and services in your property);
- the relevant registered housing provider, for example where applicable to shared ownership purchases and properties;
- the NHBC (the National House Building Council) or other similar providers for the purposes of administering your new home warranty;
- our professional advisors;
- crime and fraud prevention agencies and organisations, where requested by that organisation;
- law enforcement, taxation, legal or government authorities, where requested by that organisation; and
- any member of the Morgan Sindall Group plc group of companies.

CONSULTANTS, CONTRACTORS, SERVICE PROVIDERS OR SITE ATTENDEES

We process the contact details of the relevant employees or representatives of consultants, contractors, services providers and others that we work with. We also process the personal data of individuals who work at or visit our construction sites.

Legal Basis for processing -

- Legal Obligations (including the Health and Safety at Work etc Act 1974, the Construction (Design and Management) Regulations 2015 and the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995);
- Legitimate Interests on the basis that processing is necessary in order to perform our contract with you (or with your employer) or is in your interests and/or in the interests of our employees and other consultants, contractors and service providers in terms of health and safety (e.g. emergency evacuation), commercial disputes and/or site security (see "[Lawful basis for processing](#)"); and
- Consent (e.g. for any medical conditions that you choose to tell us about).

Types of personal data -

We collect and use the following personal information:

- name, trade/occupation, competency card (if applicable) through the Construction Industry Training Board (CITB) and/or NI number, employer, business contact details (including email address and phone numbers);
- where you are working at one of our construction sites, the name and contact details for your next of kin;
- with your consent, your contact telephone number and/or medical conditions;
- for some construction sites only, with your consent, we may also ask for your fingerprint or facial recognition details, which

are used to facilitate daily site access.

Use -

We will use the information you provide to:

- comply with our legal obligations (including reporting to the Health and Safety Executive (HSE) from time to time as required and investigating adverse events to prevent reoccurrence);
- record that you have completed a site induction and communicate with you about that induction (where applicable);
- validate your competency card (if applicable) through the Construction Industry Training Board (CITB);
- facilitate daily site access (where applicable);
- administer the commercial terms of our contract with you or your employer;
- handle any complaints or claims made by you or others;
- help prevent and detect fraud and crime;
- check references provided by you or your employer; and
- assist giving you first aid (where applicable).

Disclosure

We may share your personal information with:

- service providers who assist us to provide our services (such as our IT service providers and our customer helpline provider);
- customers and residents, where required if you are working in their homes;
- other consultants, contractors and service providers, where reasonably required for the coordination of services and works on the same site or project;
- credit reference agencies and providers of credit services for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
- our professional advisors, claims handling agencies and/or debt recovery agencies;
- crime and fraud prevention agencies and organisations, where requested by that organisation;
- law enforcement, taxation, legal or government authorities, including the HSE, where requested by that organisation; and
- any member of the Morgan Sindall Group plc group of companies.

GROUP COMPANIES AND JOINT VENTURES

We may share your personal information with other companies in the Morgan Sindall group of companies, which means Morgan Sindall Group plc and any of its subsidiaries or joint ventures, for any of the purposes outlined within this privacy notice. In particular, personal information may be shared within the group where it helps us to contact you, to assess risks, to prevent and detect potential crime and to provide our products and services efficiently.

We may share your personal information with third parties in the event that:

- we sell or buy any business or assets or the make-up of the Morgan Sindall Group plc group of companies changes in the future through mergers or acquisitions, in which case we may disclose your personal data to the other parties involved;
- we are under a duty to disclose or share your personal information to comply with our legal obligations;
- we need to enforce any contract with you; or
- we need to protect our rights, property or the safety of our employees, customers or others.

In sharing your personal information, we will ensure that your information is properly protected and used in accordance with this privacy notice. If the change to our group happens, then other parties may use this data in the same way as set out in this notice.

SHARING DATA THAT DOES NOT SAY WHO YOU ARE

Sometimes we use data, such as how far you live from the site where you are working or whether you are an apprentice or work for a small medium or large organisation, to report to our partnership clients in order to meet sustainability or community impact targets or similar obligations under our contractual obligations with our partnership clients. When we ask for such data it will be amalgamated with other data and reported in the form of numbers or percentages, without being able to identify you as an individual.

We may from time to time also collect, use and share aggregated data, such as statistical or demographic data for any purpose.

This is data that 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 data on website usage or product selections to calculate the percentage of users accessing a specific website feature or selecting a particular property option or 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 notice.

MANAGEMENT COMPANIES

Where we have shared your data with a residents' management company for your development and that management company remains under our control during a development, your data will continue to be processed in accordance with this privacy notice.

Once control of the management company has been handed over to the residents after the end of the development, we will no longer be responsible for personal data processed by the management company.

The management company will process your data for the purposes of maintaining the common parts and/or open spaces of the development and collecting services charges from residents for that purpose on an ongoing basis.

The management company will usually appoint a professional third party property management service provider to provide these services on behalf of the residents. Where the property management service provider is a data controller of your data in its own right, it will provide you with a separate privacy notice in respect of how it will process your personal data for the purposes of providing its services to the management company.

LAWFUL BASIS FOR PROCESSING

We will only use your personal information where it is permitted by law, meaning when we have one or more legal basis to do so, and where:

- we need to use your personal information to perform a contract with you;
- we need to use your personal information to comply with our legal or regulatory obligations;
- you have given us consent to use your personal information (if consent is needed); or
- it is reasonable for us to do so and there is no disadvantage to you or risk to your personal information.

In certain circumstances we rely on the legal ground known as "legitimate interests" to collect and process your personal information. This is where the processing of your personal information is necessary to pursue our legitimate interests in a way which is reasonably expected as part of fulfilling a contract that we have with you (or for the purposes of entering into that contract) in a way which is reasonably expected as part of running our business, but which is not detrimental to you and would have minimal impact on your privacy.

Effectively, this requires us to carry out a balancing test of our interests in using your personal data (for example to provide you with the information, products or services that you request from us), against the interests you have as a citizen and the rights that you have under data protection laws. The outcome of this balancing test will determine whether we can use your personal data in the ways described in this privacy notice (except in relation to marketing, where we will always rely on your express consent). We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

WHERE DO WE STORE YOUR INFORMATION AND FOR HOW LONG DO WE KEEP IT?

Your personal information is retained by us in accordance with applicable law and regulation. Our data retention periods vary depending on the nature and context of the personal information that we have in our care and are calculated taking into account the following factors:

- potential claims or litigation;
- guidance from official bodies such as the ICO;
- how long we need to keep the information to fulfil the original purpose for which it was collected; and
- legal obligations to which we are subject.

We will keep your personal information for as long as you are a customer or supplier of Lovell Partnerships Limited. We may keep your data for up to 15 years after you stop being a customer or supplier. The reasons we may do this are to:

- respond to a question or complaint or to show whether we gave you fair treatment;
- comply with our contractual obligations to you and to our partnership clients;

- study customer data as part of our own internal research;
- maintain records for shared equity ownership schemes, which can remain live for up to 25 years; and
- obey rules that apply to us about keeping records, for example, HMRC.

SENDING DATA OUTSIDE THE EEA

This section tells you about the safeguards that keep your personal information safe and private, if it is sent outside the European Economic Area (EEA).

Your personal data may, during the course of some our data processing, be transferred outside of the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our service providers. When we do this, all appropriate technical and legal safeguards are put in place to ensure you are afforded the same level of protection as within the EEA.

We will only send your data outside of the EEA to work with our suppliers who help us to run our services. If we do transfer your personal information outside the EEA to our suppliers, we will make sure that it is protected to the same extent as in the EEA. We'll use one of these safeguards:

- transfer it to a country with privacy laws that give the same protection as the EEA; and/or
- put in place a contract with the recipient that means they must protect it to the same standards as the EEA.

YOUR RIGHTS

You have a number of rights under data protection law in relation to the way that we process your personal data. These are set out below. You may contact us using the contact details in the "Introduction" to this privacy notice to exercise any of these rights and we will respond to any request received from you within one month from the date of request.

You may also contact our sales team to change your marketing preferences at any time (see "[Marketing to customers & non-customers](#)").

Your Rights are:

- A right to object to our processing of personal data about you (including for the purposes of sending marketing information to you).
- A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products).
- A right to access personal data held by us about you.
- A right to require us to rectify any inaccurate personal data held by us about you.
- A right to require us to erase personal data held by us about you. This right will only apply where (for example) we no longer need to use the personal data to achieve the purpose that we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data.
- A right to restrict our processing of personal data held by us about you. This right will only apply where (for example) you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims.
- A right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation at your request.

If you are not satisfied with the way that we have treated your data or responded to a rights request, 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.

LEGAL OBLIGATION

Most information that we ask you to provide as one of "Our customers" or "Residents and tenants" is necessary to enable us to enter into a contract with you or provide relevant services to you. If you do not provide the information required, we will not be able to proceed with the purchase of your new home or provide the services requested. Information such as your proposed

deposit, mortgage term or your family situation is not necessary and you are under no obligation to share that information with us. Any information that is voluntary will be made clear to you at the time that it is requested.

Most information that we ask you to provide to us as one of our "Consultants, contractors, service providers or site attendees" is necessary either to fulfil our health and safety obligations or to enable us to administer our contracts with you, with your employer or with our clients. Any information that is voluntary, such as medical conditions, will be made clear to you at the time that it is requested.

You are not under any obligation to provide any information that we ask you to share with us for the purposes of "Marketing to customers & non-customers".

AUTOMATED DECISION MAKING

We do not use automated decision making or automated profiling to make a decision about our customers or potential customers based on your personal data that you have shared with us. We use statistics and/or aggregated data from time to time to help us target appropriate advertisements on social media platforms and other online platforms and websites to potential customers. This is sometimes called interest based targeting or audience based targeting.

If you are a worker at one of our construction sites, we may use an automated validation service to validate your construction skills competency card (if applicable) through the Construction Industry Training Board (CITB). If your competency card does not register as valid at the time of checking, you will not (or you will no longer) be permitted access to work at one of our construction sites. If you believe that the outcome of the validation process is incorrect you have a right to raise this with us and have the decision reviewed (see "Your Rights"). This validation process is carried out on the basis of our "legitimate interests" (see "Lawful basis for processing") to ensure the competency of workers on our sites for valid health and safety reasons. You have a right to object to automated decision making (see "Your Rights").

LINKS TO THIRD PARTY WEBSITES

We are not responsible for the content, reliability, privacy and data protection practices of third-party websites, plug-ins and applications that may be linked to from our website. As such, we recommend that you review the privacy and data protection policies of any third-party websites before making further use of their services.