

Regal Group Privacy Notice

This Policy explains when and why we collect personal information about people who agree to receive communications from us, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

For the purposes of this Policy Regal London is the data controller. For all queries and issues regarding this Policy please contact:

Head of Compliance

data@regal-london.co.uk

+44(0)20 7328 7171

4-5 Coleridge Gardens, London NW6 3QH

When you consent to us contacting you, you will have the opportunity to receive information about our exclusive events, offers and all our latest development news as specifically agreed by you when you register with us.

If you consent when registering with us or when asking us to send you information, we may forward your email to other Regal Group companies and to selected third party providers in connection with Regal London's branded properties. An example would be an agent who is selling property on Regal London's behalf.

We may update or amend this Policy from time to time so please check our website occasionally to ensure that you're happy with any changes.

Any questions regarding this Policy and our privacy practices should be sent by email to data@regal-london.co.uk or by writing to Regal HoldCo Ltd, 4-5 Coleridge Gardens, London NW6 3QH. Alternatively, you can telephone +44(0)20 7328 7171 and ask to speak to our Head of Compliance.

Who are we?

We are Regal London, a property development company. Regal London comprises Regal Real Estates Limited, Regal Homes Construction Limited, Regal Homes Management Limited, Regal Shanghai Ltd, Regal HoldCo Ltd and Regal Homes Limited (together "the Regal Group"). If you consent to us doing so, we may share your personal information within the Regal Group.

How do we collect information from you?

We obtain information about you when you visit our website and register with us, for example when you contact us about properties and/or services, report a problem or if you register to receive our marketing communications.

We may also collect information about you from a number of other sources, including:

- directly from you;
- our service providers;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies and publicly accessible registers or sources of information;
- social media outlets, including in the context of promotions that we operate; and/or
- by actively obtaining your personal information ourselves, for example using website

tracking devices or the information we collect through your use of our websites, services, and solutions.

What type of information is collected from you?

The personal information we collect from you might include your name, address, email address, IP address, and information regarding what pages you access on our website and when. If you purchase a property from us, your information is held by our sales team, and an initial deposit is collected by Worldpay, our third-party payment processor, who specialise in the secure online capture and processing of credit/debit card transactions.

With regard to your visits to our website at www.regal-london.co.uk ("Website") and all associated Regal London websites including:

theatelierw14.cn
theatelierw14.co.uk
theatelierw14.com
theavenuenw6.co.uk
the-avenue-nw6.co.uk
theavenuenw6.com
claphamplace.com
thecomptonnw8.com
high-trees.co.uk
kingscrossquarter.co.uk
kingscrossquarter.com
kingscrossquarter.london
regalcapital.co.uk
regal-capital.co.uk
regal-capital.com
regal-homes.co.uk
regal-london.cn
regal-london.co.uk/cn
regal-london.co.uk
regal-london.com
regal-london.me
shoreditch-exchange.co.uk
shoreditch-exchange.com
Theclarendonwatford.co.uk
Theclarendonwatford.com
Clarendonwatford.co.uk
Clarendonwatford.com

We automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, browser plug-in types and operating system;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

How long do we keep your personal information?

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We will hold your personal information on our systems for as long as is necessary for the relevant activity in line with our data retention policy. Our retention periods are based on the requirements of relevant data protection laws and the purpose for which the information is collected and used, considering legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice, and our business purposes. We review our retention periods for personal information on a regular basis.

How do we use your personal information?

We may use your information to:

- provide you with, or if you allow us to we may permit selected third parties to provide you with, information about properties or ancillary services we feel may interest you;
- send you information about our exclusive events, offers and all our latest development news;
- ensure that content from our Website is presented in the most effective manner for you and for your computer;
- administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- allow you to participate in interactive features of our products and services (where applicable), when you choose to do so;
- keep our Website safe and secure;
- send you communications which you have requested and that may be of interest;
- complete certain transactions with you and enter into contracts with you, where relevant;
- meet our legal obligations.

What lawful bases do we rely on to use your personal information?

We rely on a range of lawful bases when we use your personal information:

- **Consent:** we rely on your consent to our use of your information in certain circumstances, particularly for our direct marketing activities.
- **Contract:** we process your personal data where it is necessary to enter into and perform our contracts with you.
- **Legal obligation:** we process your personal information in order to comply with legal obligations to which we are subject, such as our record keeping obligations or client due diligence obligations.
- **Legitimate interests:** we process your personal information where it is in our legitimate interests to do so, for example to help provide our websites to you. When we process your personal information based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your personal information for activities where our interests are overridden by the impact on you.

Who has access to your information for marketing purposes?

We will not share your information with third parties (including other members of Regal London) for marketing purposes unless you have given us your consent to do so, either when you first registered with us or at a later date. If, at any time, you want us to stop sharing your information please email us at data@regal-london.co.uk or write to us at Head of Compliance, Regal HoldCo Ltd, 4-5 Coleridge Gardens, London NW6 3QH.

Third Parties

We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties outside of the Regal Group for them to use for their own direct marketing purposes unless you have requested us to do so.

We may share your information with third parties where we are required to do so to comply with our legal or regulatory obligations.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Your choices

You have a choice about whether or not you provide us with your personal information. Where we need to collect your personal information by law or in order to process your instructions, provide you with our services or perform a contract we have with you and you decide not to provide that information when requested, we may not be able to carry out your instructions, provide our services or perform the contract we have or are trying to enter into with you. In other circumstances where you choose not to provide us with your personal information we request, your decision not to provide us with your personal information may affect our ability to provide certain of our services.

In particular, you have a choice about whether or not you wish to receive direct marketing information from us. If you do not want to receive direct marketing communications from us about our exciting properties, our exclusive events, offers and all our latest development news then you can make this clear to us when you first register with us. If you consent to our marketing, but later change your mind, then you can opt out and withdraw your consent at any time.

We will not contact you for marketing purposes by email, WhatsApp, WeChat, telephone, post or text message unless you have given us your express prior consent to do so. You can change your marketing preferences and/or unsubscribe and withdraw your consent at any time by contacting us by email; data@regal-london.co.uk, or by post at Regal HoldCo Ltd, 4-5 Coleridge Gardens, London NW6 3QH or by telephone on +44(0)20 7328 7171.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose(s) to which you originally consented.

How you can access and update your information

We are obliged to keep your personal information accurate and up to date and the accuracy of your information is important to us. We are continuously working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at data@regal-london.co.uk or write to us at: Regal HoldCo Ltd, 4-5 Coleridge Gardens, London NW6 3QH. Alternatively, you can telephone +44(0)20 7328 7171.

Your rights

Under certain conditions, you may have the right to require us to:

- provide you with further details on the use we make of your personal information
- provide you with access to the personal information we hold about you
- update any inaccuracies in the personal information we hold about you
- delete any of your personal information that we no longer have a lawful ground to use
- where processing is based on consent, stop that processing by withdrawing your consent
- object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights
- restrict how we use your personal information whilst a complaint is being investigated
- transfer your personal information to a third party in a standardised machine-readable format

In certain circumstances, we may need to restrict your rights to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege).

Security precautions in place to protect the loss, misuse or alteration of your Information

When you give us personal information, we take steps to ensure that it's treated securely. We use strict procedures and security features to try to prevent unauthorised access.

Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

Transferring your information outside of Europe

Your information may be transferred to countries outside of the UK as part of running our business. Where we transfer your personal information across national boundaries, we will protect your personal information by ensuring that those transfers are made in compliance

with all relevant data protection laws. For example, where we transfer personal information from the UK to a country outside of the UK that is not recognised by the UK as providing an adequate level of data protection, we normally do so subject to safeguards that assure the protection of your personal information, such as standard contractual clauses approved by the UK. If you would like further details of how your personal information is protected when transferred from one country to another then please contact us.

Complaints

You have the right to lodge a complaint with the Information Commissioner's Office in the UK if you think we have acted improperly in relation to your personal data. You can find a link to the Information Commissioner's website here: www.ico.org.uk

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in April 2021.