# PRIVACY POLICY

#### **BACKGROUND**

Rotherhill Developments Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website: rotherhill.com: ("Our Site/Our website") and as described in Parts 5 and 6, below, any personal data we do collect will only be used as permitted by law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using our website immediately.

#### 1 Information About Us / Data Controller

Rotherhill Developments Ltd (Referred to as Rotherhill)
Our main trading address: Office 7, The Hunting Lodge, Pera Business
Park, Nottingham Road, Melton Mowbray, LE13 OPB VAT number: 876
7751 62

Our contact email: <u>info@rotherhill.com</u> Our contact phone number: 01476 861797

#### 2 What Does This Policy Cover?

This Privacy Policy applies only to your use of our website, located at www.rotherhill.com Our website may contain links to other websites. Please note that if you follow these links this policy does not cover any external website and we have no control over how your data is collected, stored, or used by other websites. We advise you to check the privacy policies of any such websites before providing any data to them.

#### 3 What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

# 4 What Are My Rights?

Under the GDPR, you have the following rights, which we will always

## work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can contact us to find out more or to ask any questions using the details in Part 10.
- b) The right to access the personal data we hold about you. Part 9 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 10 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 10 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 9.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

# 5 What Personal Data Do You Collect? Rotherhill are committed to protecting your privacy while viewing our website and during any contact you may have with us. Whilst browsing

our website cookies may be placed on your computer in order to track usage of our website.

# a) Contact Forms

On our website we use several contact forms which can be used to get in contact with us electronically. To handle your request it is necessary to provide us with a valid name and email address, and, in addition, we store your IP address and the time of your request to prevent any misuse of our contact forms. Alternatively, you may contact us via the e-mail address cited above (Section 1). If you use one of these channels, the personal data transmitted will be stored automatically by Rotherhill as data controller to handle our contact with you. The legal basis for this processing is Art. 6(1)(f) GDPR.

In some cases we may ask you for further information, such as occupation, address or telephone number. Regarding the processing of this personal data you will be asked to grant your explicit consent. The legal basis for this processing is Art. 6(1)(a) GDPR.

## b) Information Gathered by Third Party Analytics Services

Our website uses Google Analytics, a web analysis service of Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, www.google.com ("Google Analytics" or "Google"). Google Analytics employs cookies that are stored to your computer in order to facilitate an analysis of your use of the site. The information generated by these cookies, such as time, place and frequency of your visits to our site, including your IP address, is transmitted to Google's location in the US and stored there.

Google may also transfer this information to third parties where required to do so by law or where such third parties process this data on Google's behalf. Google states that it will in never associate your IP address with other data held by Google. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly as noted elsewhere in this Privacy Policy. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website.

Google Analytics also offers a deactivation add-on for most current browsers that provides you with more control over what data Google can collect on websites you access. The add-on tells the JavaScript (ga.js) used by Google Analytics not to transmit any information about website visits to Google Analytics. However, the browser deactivation add-on offered by Google Analytics does not prevent information from



being transmitted to us or to other web analysis services we may engage.

Google Analytics also uses electronic images known as web beacons (sometimes called single pixel gifs) and are used along with cookies to compile aggregated statistics to analyse how our site is used.

You can find additional information on how to install the browser addon referenced above at the following link: https://tools.google.com/dlpage/gaoptout?hl=en.

For the cases in which personal data is transferred to the US, Google has self-certified pursuant to the EU-US Privacy Shield (https://www.privacyshield.gov/EU-US-Framework).

# c) Logfiles

We collect personal data through our internet access logs. When you access our website, your internet address is automatically collected and is placed in our internet access logs (i.e., log files on server). We also record the URLs of the websites and pages you visit, the times and dates of such visits, information about the computer hardware and software you use.

This information may include Internet protocol (IP) addresses, browser type and version, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data, number of visits, websites from which you accessed our site (Referrer), and websites that are accessed by your system via our site.

The processing of this data is necessary for the provision and the security of our website. The legal basis for this processing is Art. 6(1)(f) GDPR. We do not link these data to certain individuals. After the processing for the mentioned purposes, the data will be deleted.

## 6 How Do You Use My Personal Data?

If we do collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see Part 7, below.

As stated above, we do not generally collect any personal data. If you contact us and we obtain your personal details from your email, we may use them to respond to your email.

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

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

We will not share any of your data with any third parties for any purposes (other than storage on an email server).

## 7 How and Where Do You Store My Data?

We will only store your personal data in the UK. This means that it will be fully protected under the GDPR. Information collected under our website analytics may be transferred outside of the EU, see section 5.2

#### 8 Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

Website analytics, see section 5b and in some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

#### 9 How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 10.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### 10 How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the

following details (for the attention of Paul Bagshaw):

Email address: info@rotherhill.com Telephone number: 01476 861 797

## 11 Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.