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**PRIVACY POLICY**

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## 1. ABOUT THIS POLICY

This policy describes how we use your personal data when you use our website ([www.adgl.co.uk](http://www.adgl.co.uk)) or when we provide you with our housebuilding services (including defect management, repairs and estate management) ("Services"). We have provided this policy to ensure that you understand what personal data we may collect and hold about you, what we may use it for and how we keep it safe. You have legal rights to access the personal data that we hold about you and to control how we use it which are also explained.

## 2. WHO WE ARE AND HOW YOU CAN CONTACT US

We are Anderson Development Group Ltd and each of its direct and indirect subsidiaries, trade under the ADGL brand. Details of our main trading entities are as follows:

**Anderson Design & Build Limited** is a private limited company registered and incorporated in England and Wales with registered office address at Springfield Lodge, Colchester Road, Chelmsford, Essex, United Kingdom, CM2 5PW. Company Number: 04691622.

**Anderson Development Group Limited** is a private limited company registered and incorporated in England and Wales with registered office address at Springfield Lodge, Colchester Road, Chelmsford, Essex, United Kingdom, CM2 5PW. Company number: 14763895.

**Anderson Group Properties Limited** is a private limited company registered and incorporated in England and Wales with registered office address at Springfield Lodge, Colchester Road, Chelmsford, Essex, United Kingdom, CM2 5PW. Company Number: 05166622.

**Anderson Group Services Limited** is a private limited company registered and incorporated in England and Wales with registered office address at Springfield Lodge, Colchester Road, Chelmsford, Essex, United Kingdom, CM2 5PW. Company Number: 04691622

**Anderson O&U Limited** is a private limited company registered and incorporated in England and Wales with registered office address at Springfield Lodge, Colchester Road, Chelmsford, Essex, United Kingdom, CM2 5PW. Company Number: 11102447.

**Anderson Developments Limited** is a private limited company registered and incorporated in England and Wales with registered office address at Springfield Lodge, Colchester Road, Chelmsford, Essex, United Kingdom, CM2 5PW. Company number: 06365706.

**Erith Hills LLP** is a limited liability partnership registered and incorporated in England and Wales with registered office address at Springfield Lodge, Colchester Road, Chelmsford, Essex, United Kingdom, CM2 5PW. Company number: OC404007.

**Anderson Estates Management Limited** is private limited company registered and incorporated in England and Wales with registered office address at Springfield Lodge, Colchester Road, Chelmsford, Essex, United Kingdom, CM2 5PW. Company number: 04841522.

You can contact us in writing at the above address or by emailing [info@adgl.co.uk](mailto:info@adgl.co.uk). If you would like to speak to us, please call us on 01245 399 999.

## 3. WHAT PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect:

- Personal data that you provide to us. There are lots of ways in which you may share your personal data with us, for example, you may complete the contact form on our website, post on social media sites that we run, or contact us by telephone, email, or in person in connection with Services that you would like to buy, or have already bought, from us. When reserving an Anderson property, a reservation form will be completed in paper format. The reservation form will contain the details of the reserved property (such as price) and other transaction details, including the identity of the purchasers and other individuals involved in a transaction. We require details such as name, address, telephone numbers, email addresses, occupation, date of birth and mortgage details to process any reservation or purchase.
- Personal data that we receive from third parties. If we work with other businesses or use sub-contractors, these parties may collect personal data about you which they will share with us. For example, we may have your name and contact details passed to us by our business partners or External Sales Agent or Solicitor that refers you to us so that we can provide you with our Services, receive feedback from a sub-contractor we have instructed to help us provide you with Services that you have requested such as a courier company, or customer care related works.
- Personal data about your use of our website. This is technical information and includes details such as your browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, as well as details of how you navigated to our website and where you went when you left, what pages you viewed or searched for, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs).
- Personal data that you provide to us in relation to Services at Springfield Lodge. This information may include details such name, contact details, car registration and usage data relating to electric vehicle charging points.

#### 4. WHAT WE USE YOUR PERSONAL DATA FOR

We use your personal data in the following ways:

**Personal data that you provide to us is used to:**

- Process and respond to any enquiries you make.
- Provide you with the information and Services that you request from us.
- Provide you with marketing information in accordance with your marketing preferences.
- Manage and administer our business.
- Manage parking or site access where applicable.
- Manage access to EV charging points.
- Maintain site safety and security.
- Review and improve our Service.
- Personal data that we receive from third parties is combined with the personal data that you provide to us and used for the purposes described above.

**Personal data about your use of our website is used to:**

- Administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our website to ensure that content is presented in the most effective manner for you and

for your computer or mobile device.

- As part of our efforts to keep our site safe and secure.
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To make suggestions and recommendations to you and other users of our site about Services that may interest you or them.

## 5. COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For more information about the cookies we use and further details, please see our Cookie Policy.

## 6. WHEN WE NEED YOUR CONSENT TO USE YOUR PERSONAL DATA

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal data without asking for your consent because:

- We are entering into and carrying out our obligations under a contract with you.
- We need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our Services) and our doing so will not interfere with your privacy rights.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To perform our Services including to: Manage payments, fees and charges. Collect and recover money owed to us	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy. Asking you to leave a review or take a survey.	Performance of a contract with you Necessary to comply with a legal obligation. Necessary for our legitimate interests (to keep our records updated and to study how customers use our Services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation

To deliver relevant website content to you	Necessary for our legitimate interests (to study how customers use our Services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, Services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our Services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To respond to your questions, enquiries and complaints including to provide you with copies of our site brochures	Necessary for our legitimate interests (to develop our Services, maintain customer care standards and grow our business)

## 7. PERSONAL DATA YOU ARE LEGALLY OBLIGED TO PROVIDE

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data, we may be unable to provide our Services to you.

## 8. YOUR RIGHTS TO KNOW WHAT PERSONAL DATA WE HOLD AND TO CONTROL HOW WE USE IT

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by contacting us using the details set out in the Who we are and how you can contact us page.

You also have rights to:

- Prevent your personal data being used for marketing purposes.
- Have inaccurate personal data corrected, blocked or erased.
- Object to our using your personal data in ways that are likely to cause you damage or distress.
- Restrict our use of your personal data.
- Require that we delete your personal data.
- Require that we provide you, or anyone that you nominate, with a copy of any personal data you have given us in a structured electronic form such as a CSV file.

You can find full details of your personal data rights on the Information Commissioner's Office website at [www.ico.org.uk](http://www.ico.org.uk).

## 9. AUTOMATED DECISION MAKING AND PROFILING

We do not make use of automated decision making or profiling.

## 10. WHEN WE WILL SHARE YOUR PERSONAL DATA WITH OTHERS

We share your data with the following people in the day to day running our business:

- Other companies that are part of the Anderson Development Group Ltd
- Any business partners, suppliers and sub-contractors we work with to provide you with Services that you have requested from us.
- Our professional advisors such as lawyers, accountants, consultants, bankers, auditors, and insurers.
- Our EV charging platform provider.

- Regulatory and governmental bodies such as HM Revenue & Customs and the Information Commissioner's Office.
- NHBC, or other similar new build warranty providers.
- Other companies outside of the Anderson Development Group Ltd that partner with us to design, develop, and sell sites.

We may also share your personal information with third parties on a one-off basis, for example, if we sell or buy any business or assets (including our own), in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **11. HOW WE KEEP YOUR PERSONAL DATA SAFE**

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- Only storing your personal data on our secure servers.
- Ensuring that our staff receive regular data security awareness training.
- Keeping paper records to a minimum and ensuring that those we do have are stored in locked filing cabinets on our office premises.
- Maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems.
- Enforcing a strict policy on the use of mobile devices and out of office working.
- Only authorising access to our systems to members of staff who have been training in data protection.

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

## **12. HOW WE USE YOUR PERSONAL DATA FOR MARKETING**

We do not undertake any marketing activity other than to send out copies of our site brochures where you have requested that we do so.

We do not share your personal data with any third parties for marketing purposes.

## **13. WHEN WE WILL SEND YOUR PERSONAL DATA TO OTHER COUNTRIES**

We do not transfer your personal data outside of the UK.

## **14. HOW LONG WE KEEP YOUR PERSONAL DATA**

We only keep your personal data for as long as we actually need it. In practice this means that we will keep:

- Name and contact details for 12 years.

- A record of the Services including a copy of your full customer file we provide to you for 12 years.
- Complaint records for 3 years.

The information is kept for this period because of the NHBC or equivalent, warranty on the property.

Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely, but we take care to ensure that such data can no longer identify or be connected to any individual.

## **15. HOW YOU CAN MAKE A COMPLAINT**

If you are unhappy with the way we have used your personal data, please contact us to discuss this by emailing [info@adgl.co.uk](mailto:info@adgl.co.uk). You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting [www.ico.org.uk](http://www.ico.org.uk). Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

## **16. HOW WE KEEP THIS POLICY UP TO DATE**

We will review and update this policy from time to time. This may be to reflect a change in the Services we offer or to our internal procedures or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website ([www.adgl.co.uk](http://www.adgl.co.uk)) or you can contact us (see How to contact us) to ask us to send you the latest version of our policy.

Each time we update our policy we will update the policy version number shown at the end of the policy and the date on which that version of the policy came into force.