

PRIVACY POLICY

Last updated: 26 February 2020.

Downs Road Development LLP (a company registered in England with registered number OC415814 (“us”, “our”, “we”, “**Benny P Limited**” is the controller of your personal data collected through our website. Benny P Limited is committed to protecting and respecting your privacy.

This privacy policy (the “**Policy**”) sets out the types of personal data we collect and use when you access and visit <https://www.uniondevelopments.co.uk/> (the “**Website**”) and how we may use that data.

1. Introduction

This Policy explains who we are, why and how we process personal data collected through your use of our Website and, if you are the subject of any of the personal data concerned, what rights you have and how to get in touch with us if you need to.

When you supply any personal data to us we have legal obligations towards you in the way we use that data. For ease of reading, we have divided this Policy into several sections:

1. Introduction
2. What information can we collect?
3. How is your personal data collected?
4. How and why do we use and share your personal data?
5. For how long do we keep your personal data?
6. Security
7. International Data Transfers
8. Your Rights
9. Contact Details

It is important that you read this Policy together with any other privacy notice or fair processing notices that we may provide on the Website at or around the time that we collect or process personal data about you (for example, fair processing notices that we may display to you at the time that you sign up to receive e-mail updates from us) so that you are fully aware of how and why we are using that data.

This Policy supplements other notices on the Website and is not intended to override or replace them.

By visiting or otherwise using the Website, you agree to our terms (including as amended from time to time) and this Policy. If, for any reason, you do not agree to the terms of this Policy, please stop using the Website.

We reserve the right to revise or amend this Policy at any time to reflect changes to our business or changes in the law. Where these changes are significant we will endeavour to let

users of the Website know. However, it is your responsibility to check this Policy before each use of the Website. For ease of reference the top of this Policy indicates the date on which it was last updated.

Please note that the Website is not directed at children under the age of 13 (each "**Child**" or "**Children**") and we do not knowingly collect personal data about Children. If you believe we have collected personal data about your Child, you may contact us at info@uniondevelopment.co.uk and request that we cease processing data about your Child.

2. What information can we collect?

What is personal data?

Where this Policy refers to 'personal data' it is referring to data about you from which you could be identified – such as your name, your date of birth, your contact details and even your IP address.

By law all organisations who process your personal data in Europe are obliged to process your personal data in certain ways and to ensure that you are given an appropriate amount of information about how they use it. You also have various rights to seek information from those organisations about how they are using your data, and to prevent them from processing it unlawfully. For more information about these rights, please see the 'Your Rights' section of this Policy.

What types of data we collect from you when you use the Website

The personal data we collect from you may include:

- Identity Data which includes your name, date of birth and gender.
- Contact Data which includes your e-mail address, billing address and delivery address.
- Financial Data which includes your bank account and payment card details.
- Transaction Data which includes details about payments to and from you and other details or services you have purchased from us.
- Technical Data which includes your IP address, your login data, operating system and browser type and version.
- Profile Data which includes your username and password, your interests, preferences, feedback and survey responses.
- Usage Data which includes information about how you use the Website.
- Marketing and Communications Data which includes your preferences in receiving marketing from us and our third parties.

3. How is your personal data collected?

Direct interactions

When you use the Website to register your interest, complete a form, request marketing be sent to you, participate in social media functions, contact us by email, telephone or by post, take part in an online survey, post a comment, enter into competitions or report a problem with the Website, we may collect, store and use the personal data that you disclose to us.

Automated technologies or interactions

We will also collect personal data about you through the use of technologies such as cookies when you visit and interact with the Website. The following are examples of information we may collect:

- information about your device, browser or operating system;
- your IP address;
- information about links that you click and pages you view on the Website;
- length of visits to certain pages;
- subjects you viewed or searched for;
- response times;
- records of download errors and/or broken links;
- page interaction information (such as details of your scrolling, clicks, and mouse-overs);
- methods used to browse away from a page; and
- the full Uniform Resource Locators (URL) clickstream to, through and from the Website (including date and time).

We use the data described above for several different reasons. Firstly we use it to ensure that the Website works properly and that you are able to receive the full benefit of it. Second, we use the data to monitor online traffic and audience participation across the Website. We undertake both of these activities because we have a legitimate interest in doing so.

For more information on this kind of technology, please see our Cookies Policy.

Third parties or publicly available sources

We also partner with third parties who may collect anonymous usage or statistical data through your use of the Website (including, for example, business partners, sub-contractors in technical and delivery of services, advertising networks, analytics providers, search information providers, credit reference agencies). We may receive information about you from these partners through the use of cookie technologies to personalise advertisements for goods and services. To opt out of receiving advertisements tailored to your interests by our partners, visit the European Interactive Digital Advertising Alliance at <http://youronlinechoices.eu/>.

Updating your information

If you want to update the information you have previously given to us, you can contact us at info@uniondevelopment.co.uk.

4. How and why do we use and share your personal data?

Lawful basis for processing your information

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- Where you have asked us to do so, or consented to us doing so;
- Where we need to do so in order to perform a contract we have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

Here are some examples about how we may use the information we collect about you and the lawful basis we rely on to do so.

Activity	Examples of the types of personal data we may collect	Lawful basis for processing
To manage our relationship with you including notifying you of any changes to the Website or services provided on the Website.	Identity, contact, profile information, transaction data and marketing communications information.	To take the necessary steps to arrange a contract with you. To perform our contract with you. To fulfil our legal obligations to you.
To administer and protect our business and the Website (including troubleshooting, data analysis and system testing).	Identity, contact and technical information.	To perform our contract with you.
To deliver relevant content, newsletters and advertisements to you via the Website.	Identity, contact, profile, usage, marketing and communications and technical information.	We rely on legitimate interest to promote products, surveys and services we offer that you may be interested in.
To use data analytics to improve the Website, marketing, customer relationships and experiences.	Marketing communications information, technical and usage information.	We rely on legitimate interest in optimising the content of the Website and ensuring that you are served with relevant commercial

		communications as you use them.
To respond to your enquiries where you have contacted us via e-mail or telephone or participated in any surveys or reviews.	Identity, contact, marketing communications information and technical information.	We rely on legitimate interest in responding and contacting you regarding the enquiries you have made in relation to the services we offer and reviewing your responses to our surveys.

Marketing

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting Out of Marketing

To unsubscribe from marketing emails at any time, please click on the unsubscribe link at the bottom of any marketing email. You may also contact us or the third party directly if you do not wish to receive any marketing materials from us or them.

We may retain your e-mail address on file should you ever 'opt-out' of receiving e-mails from us. We will retain your e-mail address in order to ensure that we continue to honour and respect that opt-out request.

Sharing your personal data

Depending on how and why you provide us with your personal data we may share it in the following ways:

- we may share your personal data with any member of our company group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- with selected third parties who we sub-contract to provide various services and/or aspects of the Website's functionality, such as where third party plugins provide functionality such as message boards or image hosting services (see "Service Providers" below); and

- with analytics and search engine providers that assist us in the improvement and optimisation of the Website as described above.

We may also disclose your personal data to third parties in the following events:

- if we were to sell or buy any business or assets, in which case we might disclose your personal data to the prospective seller or buyer of such business or assets as part of that sale;
- if Benny P Limited or substantially all of its assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or if we are asked to provide your details to a lawful authority in order to aid in the investigation of crime or disorder; and/or
- in order to enforce or apply the Website's terms of use or terms and conditions; or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Service Providers

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal data they need to fulfil the services we request, and we stipulate that they protect this data and do not use it for any other purpose. We take these relationships seriously and oblige all of our data processors to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights as a data subject.

Links to third party sites

Where we provide links to third party websites, plug-ins and applications that are not affiliated with the Website such sites are out of our control and are not covered by this Policy. If you access third party sites using the links provided, the operators of these sites may collect personal data from you that could be used by them, in accordance with their own privacy policies. Please check these policies before you submit any personal data to those websites.

5. For how long do we keep your personal data?

We will hold your personal data on our systems only for as long as required to provide you with the services you have requested, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for

a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your data: see 'Your Rights' below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

6. Security

Benny P Limited takes the protection of your information very seriously. We have put in place appropriate security measure to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, including use of secure servers and passwords.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. International Data Transfers

Please note that some of our service providers may be based outside of the European Economic Area (the "EEA"). These service providers may work for us or for one of our suppliers and may be engaged in, among other things, the fulfilment of the provision of services or support services.

Where we transfer your data to a service provider that is outside of the EEA we seek to ensure that appropriate safeguards are in place to make sure that your personal data is held securely and that your rights as a data subject are upheld. Transfers of personal data are either made:

- to a country recognised by the European Commission as providing an adequate level of protection; or
- to a country which does not offer adequate protection but whose transfer has been governed by the standard contractual clauses of the European Commission or by implementing other appropriate cross-border transfer solutions to provide adequate protection.

By submitting your personal data, you agree to this transfer, storing or processing. If you would like more information about how the mechanism via which your personal data is transferred, please contact Info@uniondevelopment.co.uk.

8. Your Rights

As a data subject you have a number of rights in relation to your personal data. Below, we have described the various rights that you have, as well as how you can exercise them.

Right of Access

You may, at any time, request access to the personal data that we hold which relates to you (you may have heard of this right being described as a "**subject access request**").

Please note that this right entitles you to receive a copy of the personal data that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal data lawfully. It is not a right that allows you to request personal data about other people, or a right to request specific documents from us that do not relate to your personal data.

You can exercise this right at any time by writing to us by contacting us and telling us that you are making a subject access request. You do not have to fill in a specific form to make this kind of request.

Your Right to Rectification and Erasure

You may, at any time, request that we correct personal data that we hold about you which you believe is incorrect or inaccurate. You may also ask us to erase personal data if you do not believe that we need to continue retaining it (you may have heard of this right described as the "**right to be forgotten**").

Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is right. Further, we are not always obliged to erase personal data when asked to do so; if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to erase we will tell you what that reason is at the time we respond to your request.

You can exercise this right at any time by contacting us and telling us that you are making a request to have your personal data rectified or erased and on what basis you are making that request. If you want us to replace inaccurate data with new data, you should tell us what that new data is. You do not have to fill in a specific form to make this kind of request.

Your Right to Restrict Processing

Where we process your personal data on the basis of a legitimate interest (see the sections of this Policy which explain how and why we use your information) you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

You may also ask us to stop processing your personal data (a) if you dispute the accuracy of that personal data and want us verify that data's accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer

need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

You can exercise this right at any time by time by contacting us and telling us that you are making a request to have us stop processing the relevant aspect of your personal data and describing which of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request.

Your Right to Portability

Where you wish to transfer certain personal data that we hold about you, which is processed by automated means, to a third party you may write to us and ask us to provide it to you in a commonly used machine-readable format.

Because of the kind of work that we do and the systems that we use, we do not envisage this right being particularly relevant to the majority of individuals with whom we interact. However, if you wish to transfer your data from us to a third party we are happy to consider such requests.

Your Right to object to processing

You may object to processing of your personal data where we rely on legitimate interest for processing that personal data. We will comply with your request unless we have a compelling overriding legitimate interest for processing or we need to continue processing your personal data to establish, exercise or defend a legal claim.

Your Right to stop receiving communications

Where we send you e-mail marketing communications (or other regulated electronic messages) you have the right to opt-out at any time. You can do this by using the 'unsubscribe' link that appears in the footer of each communication (or the equivalent mechanism in those communications).

Alternatively, if for any reason you cannot use those links, or if you would prefer to contact us directly – you can unsubscribe by writing to us at info@uniondevelopment.co.uk and telling us which communications you would like us to stop sending you.

Your Right to object to automated decision making and profiling

You have the right to be informed about the existence of any automated decision making and profiling of your personal data, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you.

Exercising your rights

When you write to us making a request to exercise your rights we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information then we may delay actioning your request until you have provided us with additional information (and where this is the case we will tell you).

9. Contact Details

If you have any queries regarding this Policy, if you wish to exercise any of your rights set out above or if you think that the Policy has not been followed, please contact us by emailing at info@uniondevelopment.co.uk

You may also wish to lodge a complaint to the supervisory authority about the way we process your personal data. We would however appreciate the chance to address your concerns before you approach the supervisory authority so please contact us in the first instance.