



PRIVACY NOTICE

August 2022

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1. Homebuddy's statement of intent regarding your Personal Data

1.1. Under the Data Protection Act 2018, 'Personal Data' is defined as:

"any information relating to an identified or identifiable living individual ('data subject'); an identifiable living individual is a living individual who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

1.2. Homebuddy respects your privacy and is committed to protecting your Personal Data. This Privacy Notice will inform you as to how we will look after your Personal Data, tell you about your privacy rights and how the law protects you.

1.3. If at any stage you have questions or concerns about our use of your Personal Data, please contact us at info@homebuddy.co.uk ensuring that the subject matter is entitled "Data Protection".

2. Purpose of this Privacy Notice

2.1. This Privacy Notice aims to give you information on how the homebuddy collects and processes your Personal Data.

2.2. It is important that you read this Privacy Notice so that you are fully aware of how and why we are using your data.

3. Our Contact details

3.1. We are homebuddy, a trading name of RDD Homes Limited. RDD Homes Ltd is a company incorporated in England and Wales under company number 13648153 whose registered office is at c/o Berry Smith Lawyers, Haywood House, Dumfries Place, Cardiff, CF10 3GA.

3.2. For any and all data protection enquiries, please contact us at info@homebuddy.co.uk ensuring that the subject matter is entitled "Data Protection".

4. Changes to the Privacy Notice and your duty to inform us of changes

- 4.1. We keep our privacy notice under regular review. This current version was updated in August 2021.
- 4.2. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

5. The data we collect about you

- 5.1. We collect, use, store and transfer different categories of Personal Data about you which we have grouped together as follows:

- (a) **Identity Data** which is broken down as: first name, last name, username or similar identifiers, title, gender
- (b) **Contact Data** which is broken down as: your postal address, email address and telephone numbers.
- (c) **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- (d) **Transaction Data** includes details of products and services you have been provided with as a result of using the homebuddy website and services.
- (e) **Profile Data** includes your username and password on our website, purchases or orders made by you for our services, your preferences, and feedback and survey responses.
- (f) **Usage Data** includes information about how you use our website and services.
- (g) **Marketing and Communications Data** includes your preferences in receiving such communications.
- (h) **Biometric data;** includes photographs of you that can be used to digitally identify who you are.

- 5.2. Please note that the above categories are the only pieces of Personal Data that we collect from you. It is not an exhaustive list of all categories of Personal Data.

5.3. We **do not** collect:

- (a) **Financial Data** such as but not limited to bank accounts and payment card details.
- (b) **Health Data** provided by, or on behalf of, those injured rugby players that we may assist.
- (c) **Those Special Categories of Personal Data** as further described in clause 5.5 below.

5.4. We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website 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.

5.5. **Special Categories of Personal Data:** these are details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and data.

5.6. We do not collect those examples of special categories of data identified in clause 5.5 nor do we collect any information about criminal convictions and offences. **However, we do collect Biometric Data which is used to verify your identification to allow us to comply with our legal requirements.**

6. If you fail to provide Personal Data

Where we need to collect Personal Data by law, or under the terms of the contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the homebuddy services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

7. We use different methods to collect data from and about you including through:

7.1. **Direct interactions.** You may give us your Identity and Contact Data by registering on the homebuddy website, by filling in forms or by

corresponding with us by post, phone and e-mail or otherwise. This includes Personal Data you provide when you:

- (a) apply for our services;
- (b) create an account on our website;
- (c) subscribe to our service or publications;
- (d) request marketing to be sent to you;
- (e) enter a promotion or survey;
- (f) give us some feedback;
- (g) provide unsolicited information to us.

7.2. Automated interactions. As you interact with our website we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, and other similar technologies.

7.3. Third parties (or publicly available sources). We may receive categories of Personal Data about you from various third parties as set out below:

- (a) Technical Data from analytics providers such as Google; advertising networks and search information providers.
- (b) Contact and Transaction Data from providers of technical and delivery services.
- (c) Identity and Contact Data from data brokers, aggregators or recruitment agencies.
- (d) Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.
- (e) Identity, Contact, Transaction and Marketing and Communication data from those homebuddy partners who offer additional services to our customers.

8. How we use your Personal Data

8.1. 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:

- (a) Where we need to perform the contract we are about to enter into or have entered into with you.

(b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

(c) Where we need to comply with a legal or regulatory obligation.

8.2. We may also use your Personal Data in the following situations, which are likely to be rare:

(a) Where we need to protect your interests (or someone else's interests).

(b) Where it is needed in the public interest or for official purposes.

8.3. Generally we do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

9. Purposes for which we will use your Personal Data

9.1. 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.

9.2. 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 additional details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out.

9.3. Please note, for the purpose of the table below, the following terms are defined as:

(a) **Legitimate Interest** means the interest of Homebuddy in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

(b) **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

(c) **Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Purpose/Activity	Category of Personal Data	Lawful basis for processing including basis of legitimate interest
1. To register you as a new client and confirm your identity.	(a) Identity (b) Contact (c) Biometric Data	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests: (d) To be able to provide you with our services
2. To process and deliver our services to you.	(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests
	(a) Identity	

<p>3. To introduce you to our homebuddy partners who offer additional services.</p>	<p>(b)Contact (c)Profile (d)Marketing and Communications</p>	<p>(a)Performance of a contract with you (b)Necessary for our legitimate interests:</p> <ul style="list-style-type: none"> To study how customers and clients use the homebuddy services.
<p>4. To manage our relationship with you which will include:</p> <p>(a)Notifying you about changes to our terms or privacy policy (b)Asking you to leave a review or take a survey</p>	<p>(a)Identity (b)Contact (c)Profile (d)Usage (e)Marketing and Communications</p>	<p>(a)Performance of a contract with you (b)Necessary to comply with a legal obligation (c)Necessary for our legitimate interests:</p> <ul style="list-style-type: none"> To keep our records updated; and To study how customers and clients use the homebuddy services.
<p>5. To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a)Identity (b)Contact (c)Profile (d)Usage (e)Marketing and Communications</p>	<p>(a)Performance of a contract with you (b)Necessary for our legitimate interests:</p> <ul style="list-style-type: none"> to study how customers and clients use the homebuddy services; and

		<ul style="list-style-type: none"> to develop our services and grow our business.
<p>6. To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Profile (d) Technical (e) Usage</p>	<p>(a) Necessary for our legitimate interests:</p> <ul style="list-style-type: none"> for running our business, provision of administration and IT services, network security, to prevent fraud; in the context of a business reorganisation or group restructuring exercise. Necessary to comply with a legal obligation
<p>7. To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>(a) Necessary for our legitimate interests;</p> <ul style="list-style-type: none"> to study how customers use our services; to develop our services and website; to grow our business; and to develop and improve our marketing strategy.
<p>8. To use data analytics to improve our website, services, marketing,</p>	<p>(a) Technical (b) Usage</p>	<p>(a) Necessary for our legitimate interests;</p>

customer relationships and experiences		<ul style="list-style-type: none"> • to define types of customers for our services; • to keep our website updated and relevant; • to develop our business; and, • to develop and improve our marketing strategy.
9. To make suggestions and recommendations to you about our services that may be of interest to you	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests: <ul style="list-style-type: none"> • to develop our services; and, • to grow our business

10. Marketing

10.1. We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising. We have established the following Personal Data control mechanisms:

(a) Promotional material from us. We may use your Identity, Contact, Technical, Usage and Profile 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 products, services and offers may be relevant for you (we call this marketing).

- (b) You will receive marketing communications from us if you have, registered your interest through our website, requested information from us or purchased services from us.
- (c) Third-party marketing. We will get your express opt-in consent before we share your Personal Data with any company outside of homebuddy for marketing purposes.
- (d) Opting out. You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.
- (e) Where you opt-out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of the service we provide. It only relates to our use of your Personal Data for marketing.
- (f) Cookies. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or <https://www.allaboutcookies.org/>.
- (g) To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

11. Change of purpose

- 11.1. We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.
- 11.2. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 11.3. Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

12. Disclosures of your Personal Data

- 12.1. We may have to share your Personal Data with the parties set out below for the purposes set out in the table above:
 - (a) **Internal Third Parties:** our homebuddy partners who provide additional services, other companies or departments in homebuddy acting as processors or joint controllers and provide IT and system administration services and undertake leadership reporting;

(b) **External Third Parties:** service providers acting as processors based who provide IT and system administration services, or those homebuddy partners who provide additional services.

(c) **Professional advisers:** acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting and payroll services.

12.2. 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.

13. International transfers

13.1. None of our external third parties are based outside the European Economic Area (EEA) so our processing of your Personal Data will not involve a transfer of data outside the EEA.

13.2. However, should we at any time transfer your Personal Data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented.

13.3. We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission.

13.4. Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in Europe.

13.5. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to Personal Data shared between the Europe and the US.

14. Data security

14.1. We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

14.2. 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.

15. Data retention

15.1. 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.

15.2. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

15.3. 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.

16. Your legal rights

16.1. Under certain circumstances, you have rights under data protection laws in relation to your Personal Data to request the following:

(a) access to your Personal Data.

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it

(b) correction of your Personal Data.

- Request a correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

(c) erasure of your Personal Data.

- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or

remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

(d) object to processing of your Personal Data.

- Object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

(e) restrict of processing your Personal Data.

- Request to restrict the processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

(f) transfer of your Personal Data.

- Request a transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

(g) withdraw consent to any consent that you have previously given.

- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

16.2. If you wish to exercise any of the rights set out above, **please contact us at info@homebuddy.co.uk** and writing in the subject matter "Data Protection".

16.3. You can also contact the Information Commissioner's Office via <https://ico.org.uk/> for information, advice or to make a complaint.

16.4. You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

16.5. We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

16.6. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

If at any stage you have questions or concerns about our use of your Personal Data, please contact us at info@homebuddy.co.uk ensuring that the subject matter is entitled "Data Protection".

***** End of Privacy

Notice*****