



PRIVACY NOTICE

INTRODUCTION

Aequus Group comprises of, Aequus Group Holdings Ltd (Holding Company), Aequus Developments Ltd (Management of Private Rental) and Aequus Construction Ltd (Housing Developers) both wholly owned companies of Bath and North East Somerset Council. The companies were set up to develop, deliver, own and manage property for both the rental and homeowner's market with the profits from both companies helping to support the Council to fund front line public services.

Aequus Group is committed to protecting and respecting your privacy.

This policy (together with our Terms and Conditions and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us or other companies within the Aequus Group, what we will use it for and with whom we share it. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Aequus Developments Limited (ADL) is the primary data controllers. Registered in England No ZA607503 Registered Office: Cambridge House, Henry Street, Bath, BA1 1BP

Aequus Group may change this policy from time to time by updating this page. This policy is effective from 01 April 2019.

In this Policy the term "Data Protection Legislation" means (i) before 25 May 2018, the EU Data Protection Directive 95/46 and all national implementing laws (including the UK Data Protection Act 1998); and (ii) on or after 25 May 2018, the EU General Data Protection Regulation 2016/679; together with all other applicable legislation relating to privacy or data protection including the UK Data Protection Act 2018.

COLLECTING YOUR PERSONAL INFORMATION

We may collect, record and use information about you in physical and electronic form and will hold, use and otherwise process it in accordance with the Data Protection Legislation and as set out in this policy. We may collect or obtain such information because you give it to us (for example by filling in a form on our Website or by corresponding with us by phone, e-mail or otherwise), or because other people give that information to us on your behalf. It includes personal data you provide when you register on the Website for us to contact you, and when you report a problem with our Website.

If any information which you provide to us relates to a third party (such as a friend, spouse or other family member), by providing us with their personal data you confirm that you have obtained any necessary permissions from such persons to the reasonable use of their personal data in accordance with the above provisions or are otherwise permitted to give us this information.

The personal data we collect and process may include:

- your name;
- your contact information such as your home address email address and telephone number;
- any other information about you that you disclose to us when registering your interest via the Website; and
- your IP address, your browser type and language and other information about your visit to our website.

If you fail to provide us with your personal data, or you object to us processing such information, we may not be able to fulfil our agreement with you (such as to send you the information you requested).

Non-personal data regarding the use of this Website, such as the number of hits per page, is captured automatically. This information enables us to analyse the use of the Website and customer traffic and is used to develop and improve our website. Like most websites, we also use “cookies” to help us improve our website’s use and speed. Cookies are small text files that websites transfer to your electronic device and mean that a website will remember you. There are more details in our Cookie Policy.

We do not carry out automated decision-making or profiling in relation to your personal information.

USING YOUR PERSONAL INFORMATION

We, or another company in the Aequus Group, may collect, hold and use information about you in the following ways and for the following purposes:

- to manage and respond to any request you submit through our website;
- to provide you with the information, products and services that you request from us (for example to send you our brochure);
- to contact you by telephone, post or email about products, developments or services that may be relevant to you, including information about other properties we may develop, unless you indicate at any time that you do not wish us to do so;
- for research purposes; and
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

SHARING AND TRANSFERRING YOUR PERSONAL INFORMATION

Where you submit personal information on this Website or provide it to us by other means, that information is disclosed to and used by Aequus Group and third parties authorised to act on our behalf or to provide services to Aequus Group to provide the information that you have requested and for the other purposes outlined in this Privacy Policy.

Our Rental Portfolio is managed by Carter Jonas who are a data controller in their own right. Their Privacy Policy can be viewed on their website here: [Privacy Policy and Data Protection](#). We operate a Data Sharing Agreement with Gregory’s which governs data sharing arrangements and compliance with data protection law. All our employees and data

processors, who have access to and are associated with the processing of personal data, are obliged to respect the confidentiality of your personal data.

Our Sales & Marketing for Manor Gardens Development is managed by Connells Estate Agent and their Privacy Notice can be reviewed here - [Connells Privacy Information](#). We operate a Data Sharing Agreement with Connells which governs data sharing arrangements and compliance with data protection law. All our employees and data processors, who have access to and are associated with the processing of personal data, are obliged to respect the confidentiality of your personal data.

For any data received as part of **public consultations**, the information may be shared with B&NES Council for the purpose of that consultation only.

We work with third parties (**such as Weston College who administer our website**) to research certain usage and activities on our Website on our behalf. No personal information about you is shared, however in the course of conducting this research these third parties may place a unique 'cookie' on your browser.

Aequus Group also reserves the right to disclose information relating to individuals in order to comply with applicable law, and legitimate government or other regulatory requests in accordance with UK data protection law.

We will ensure that, if we share your information with third parties, any such disclosure complies at all times with Data Protection Legislation.

We will not generally transfer personal information about you in our possession to countries outside the European Economic Area ("EEA") or to any country not deemed to provide adequate protection of personal data. If we, or our permitted third parties, do transfer your personal data outside the EEA in certain circumstances (for example because we have to provide such information by law), we or they will put in place appropriate safeguards to ensure that your personal data remains adequately protected.

LEGAL GROUNDS FOR USING YOUR PERSONAL INFORMATION

Data Protection Legislation requires us to inform you of the legal grounds on which we rely in order to process your personal data. We rely on one or more of the following lawful grounds:

- you have explicitly agreed to us processing your information for a specific reason or purpose (for example when you register your details on our Website);
- the processing is necessary for us to take steps to enter into an agreement with you; and/or
- the processing is necessary for the purposes of a legitimate interest pursued by us, including to keep you informed about products, developments or services that may be relevant to you, including information about other properties we may develop (unless you indicate at any time that you do not wish us to do so); to protect our business interests; or to evaluate, develop or improve our services.

To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will generally do so because you have given us your explicit consent to process that data. The exception to this would be where we process your personal data for pursuing legal proceedings against a tenant.

In these very occasional circumstances, this is done under Schedule 1 Part 3 of the Data Protection Act 2018 - Legal claims.

Please note that in certain circumstances it may be still lawful for us to retain your information even where you have withdrawn your consent, if one of the other legal bases described above is applicable and where it is fair to do so.

PROTECTING AND KEEPING YOUR PERSONAL INFORMATION

We will only keep the information we collect about you for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. We will normally delete your personal data in our line with Retention Policy but may retain your information for longer than this, provide it is permitted for a legal, regulatory or other legitimate business purpose. We will regularly review our files to check that information is accurate, up-to-date and still required.

All data is stored securely and security measures and procedures are in place relating to the storage and disclosure of information to prevent unauthorised access. However, although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure and we cannot guarantee the security of data transmitted to us or by us.

YOUR RIGHTS

At any time, you have the following rights in relation to your personal data to be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);

- to request access to or a copy of any personal data which we hold about you;
- to ask that we update the personal data we hold about you or correct such personal data that you think is incorrect or incomplete;
- to ask us to delete your personal data, if you consider that we do not have the right to hold it;
- to object to your personal data being processed in certain circumstances; and
- to request not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.
- to ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible. This only applies to information you have given us and if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated;
- to withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);
- to ask us to stop or start sending you marketing messages by using the below contact details;

We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that your information is up to date, do let us know if any of your personal details change. We will correct any incorrect or incomplete information and will stop processing your personal data, or erase it, where there is no legal reason for us to continue to hold or use that information.

We will endeavour to respond within a reasonable period and in any event within one month to any request relating to your data protection rights in compliance with Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

YOUR QUERIES

If you have any queries regarding privacy issues or if you wish to raise a complaint about how we are using your personal data, then please write to us at Aequus Group, Cambridge House, Henry Street, Bath, BA1 1BP OR email enquiries@aequusdevelopments.co.uk

Our Data Protection Officer may be contacted at One West, Guildhall, High Street, Bath, BA1 5AW email: i-west@bathnes.gov.uk tel: 01225 395959

If you have concerns about our use of your information, you also have the right to make a complaint to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK and who may be contacted by calling 0303 123 1113.