

## Principal Tower Privacy Policy

W1 Developments Limited ("we") are committed to protecting and respecting your privacy. This policy (together with our terms of use) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of data protection legislation the data controller is W1 Developments Limited whose registered office is at Heron Place, 3 George Street, London, W1U 3QG.

You can contact us at any time using the email address: [Kerstin@w1developments.com](mailto:Kerstin@w1developments.com)

### WHY WE USE YOUR DATA AND THE LEGAL BASIS FOR IT

Data Protection law says we must have a reason to use your data. This could be to fulfil a contract we have with you, when we have a legal duty to do so, where it is in our 'legitimate interest' or where you give us your consent.

When we have a commercial reason to use your information, this is called a 'legitimate interest'. If we are going to rely on it as the reason for using your data we must tell you.

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. 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) or Consent

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about matters that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business) or Consent

### INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site [www.w1developments.com](http://www.w1developments.com) ("our site"). This includes information provided at any time whilst using our site, subscribing to our service, posting material or requesting further services. We may also ask you for information when you report a problem with our site.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- Information regarding the type of property, be it apartment, penthouse or other, that you are interested in for our records.

### IP ADDRESSES AND COOKIES

We may collect information about your computer, including where available your IP address, operating system and browser type for system administration. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service.

You can set your browser to refuse all or some cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

### WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). We will only send your data outside of the EEA to comply with a legal duty or work with our suppliers in providing products and services to you. If we do transfer your personal information outside the EEA to our suppliers, we will make sure that it is protected to the same extent as in the EEA. We will use one of these safeguards:

- Transfer it to a non-EEA country where the European Commission has deemed that such country provides an adequate level of protection for personal data.
- Put in place a specific contract approved by the European Commission with the recipient that means they must protect it to the same standards as the EEA.

- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.

Unfortunately, the transmission of 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 your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you about changes to our service.

#### **WHO WE SHARE YOUR PERSONAL INFORMATION WITH**

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 736 of the UK Companies Act 1985.

We may share your personal information with official bodies that include:

- HM Revenue & Customs, regulators and other tax authorities;
- law enforcement and fraud prevention agencies; and
- outside companies we work with to provide services to you and to run our business.
- agents, suppliers, sub-contractors and advisers

We may also share your personal information if the makeup of our business structure changes in the future:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

During any such process we may share your data with other parties involved. We will only do this if they agree to keep your data safe and private.

We may also share your personal data if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

#### **YOUR RIGHTS**

You have these rights:

- to get a copy of the personal information we hold about you;
- to question any information we have about you that you think is incorrect, so that we can take reasonable steps to check and correct it;
- to share your data with outside companies, as a digital file, so that you can keep and use it yourself, or give it to other organisations;
- to object to us keeping or using your personal data;
- to ask us to delete, remove or stop using your personal data if there is no need for us to keep it; and
- to restrict the use of your data, so that it can only be used for certain things, such as legal claims or to exercise legal rights.

There may be legal or other official reasons why we need to keep or use your data.

To exercise any of these rights please contact us at [kerstin@w1developments.com](mailto:kerstin@w1developments.com)

### **THIRD PARTY SITES**

Our site may, from time to time, contain links to and from the websites of our partner networks. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **HOW LONG DO WE KEEP YOUR DATA?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the 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 requirement.

### **IF YOU CHOOSE NOT TO GIVE US YOUR PERSONAL DATA**

You can choose not to give us personal information. We may need to collect personal information by law, or to enter into or fulfil a contract we have with you. If you choose not to give us this personal information, it may mean that we cannot fulfil our contract with you, or do what we are required to do by law.

### **HOW TO WITHDRAW YOUR CONSENT**

You can withdraw your consent at any time. Please contact us using [kerstin@ridgeford.com](mailto:kerstin@ridgeford.com) if you want to do so. This will only affect the way we use information when our reason for doing so is that we have your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. This will not affect the lawfulness of our use of the data before your consent was withdrawn.

### **CREDIT REFERENCE AGENCIES (CRAS)**

We may carry out credit and identity checks when you apply for a product or services for you or your business, and when you are using our services. We may use Credit Reference Agencies to help us with this.

We will share your personal information with CRAs and they will give us information about you. This data includes:

name, address and date of birth of you or your officers or members;  
your credit application;  
your financial situation and history;  
fraud prevention information; and  
public information, from sources such as the Electoral Register and Companies House.

We use this data to assess your application, including the accuracy of the information you have provided, as well as to manage our relationship, trace and recover debts, tell you about relevant offers and to help and detect financial crime.

We will go on sharing your personal information with CRAs for as long as you are a customer.

### **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

### **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [kerstin@w1developments.com](mailto:kerstin@w1developments.com)

### **HOW TO COMPLAIN**

Please let us know if you are unhappy with how we have used your personal information. You can contact us using [kerstin@w1developments.com](mailto:kerstin@w1developments.com). You also have the right to complain to the regulator,

and to lodge an appeal if you are not happy with the outcome of a complaint. In the UK this is the Information Commissioner's Office <https://ico.org.uk/>