

# SUPPLY CHAIN PRIVACY NOTICE

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## What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

## Data Protection and Privacy Statement

This website is owned and run by The Cruden Group. We are committed to protecting your privacy and recognise that when you choose to provide us with information about yourself, you trust us to act in a responsible manner. Please read this policy carefully. By using this website, you understand that we will collect certain information from you. We will amend this statement to reflect changes in our personal data processing arrangements, legislation or the business and therefore request you re-visit the statement on a regular basis. The statement applies to this website only; it does not apply to any third party websites that are linked to on this website.

## What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

This statement explains a) who we are, b) the information we collect, c) how we use the information and d) where you can go to find out more.

### a) Who are we

Cruden Investments Limited is registered in Scotland under company number SC044986. Registered address: 16 Walker Street, Edinburgh, EH3 7LP. Cruden Investments and its subsidiary companies (forming the Cruden Group) own and operate this website. Cruden Investments Limited is the controller of personal data processed in connection with this Policy.

### b) The information we collect

We collect information from you when you when you:

- use our website (in the form of traffic data) – this includes your IP address, URL you visited before you visited our website, the URLs of all the pages you viewed on our website and the URL of the page you viewed after you left our website.
- complete any online forms – this may include personal contact details, such as name, address, telephone number, email address, date of birth, budget, income. We also use Cookies – see below for more information.

In addition to information provided by you, we collect personal data that is provided by third party portals (such as Rightmove, Zoopla etc., and by organisations appointed to act for us as sales and marketing agents, usually estate agents).

Through the analysis of statistical information, we can provide our website users with the best user experience.

### **Website traffic data**

You should be made aware that we do keep a record of your movements across this website which is logged automatically. This will include the IP address of the device you are using to access this website, the URL (Uniform Resource Locator, also known as website address) you visited before you visited our website, the URLs of all the pages you viewed on our website and the URL of the page you viewed after you left our website. We use this information for marketing and research purposes and also to help us develop our website, products and range of services. We may provide aggregate statistics about customers, traffic patterns and related site information to reputable third parties, but these statistics will not include personally identifying information.

### **Cookies**

Cookies are small text files sent by us to your computer and stored by your browser or other internet access device. These are used to enable the website to identify who you are and provide you with a more personal service but they never contain personally identifiable information. Most browsers are automatically set to accept cookies, however you can usually override these settings to restrict or even disable them; however doing so may affect your use of this website.

If you want to stop cookies being stored on your computer in the future or delete existing cookies, please refer to your browser manufacturer's instructions. Further information on deleting or controlling cookies is also available at [www.AboutCookies.org](http://www.AboutCookies.org).

### **Online forms**

We collect information you give us when you register your interest, request an appointment, callback or brochure or subscribe for updates. We request only the information we need to provide a service to you, such as your name, postal address, telephone number and email address. Where we would like more information to help us improve our services, over and above the basic required information, it will be clear that your response is voluntary (through non-mandatory fields) and you are free not to provide us with more information if you would prefer not to do so.

### **Improvements**

The Cruden Group is committed to improving the service and information we are able to provide our users. We are therefore continually seeking ways of improving and upgrading this website. With this in mind, we reserve the right to change the way this site operates and how we process information. However, we will continue to respect the privacy and preferences of all users of this website.

#### **c) How we use your information**

We use your information:

- to provide you with the website and to contact you to provide information about our developments and projects;
- to develop our website, products and range of services; and
- for marketing and research purposes.

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 we need to perform the contract we are about to enter into or have entered into with you;
- 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; and
- Where we need to comply with a legal or regulatory obligation.

We do not make important decisions on the basis of automated decision making we undertake in respect of your personal data.

You may ask us to remove you from our email alert lists at any time by unsubscribing from the links in our emails or by writing us at the address above. We will also offer you the option of correcting your details and of being removed from future email alerts when we send you an email alert.

### **Disclosure of Personal Data**

The information you provide to us will be treated as confidential. However, we may disclose your information to other third parties who act for us for the purposes set out in the policy or for purposes approved by you. These include:

- Any organisation that buys our company or our assets, or with another organisation from which we acquire a company or business, and in the course of any preceding negotiations with that organisation, which may or may not lead to a sale.
- Our funders or potential funders, such as our bank and with our professional advisors who have a reasonable need to see it.
- Group companies of ours so that they can provide you with information about homes and schemes available from them. We may provide anonymous aggregated data to reputable third parties on a commercial basis.
- Third party providers who supply services to us, or who process information on our behalf, access to your information with your permission (for sub-contractors operating customer care processes). Where doing so, we will always take steps to confirm that their security measures are adequate to protect your information.
- Third parties whom you may ask us to, for example if you ask us to put you in contact with professional advisors (such as solicitors or mortgage brokers).
- If you purchase a property from us, we may also pass your basic information (name and address) to utility providers who require your information to provide services to you (for example council tax or electricity).
- Enforcement authorities if asked to do so, or to a third party in the context of actual or threatened legal proceedings or if otherwise required to do so by law.

### **How we keep your data secure**

We do not transfer your data (or make it available) outside the EEA. The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Only authorised persons have access to your information. By way of file permissions within our IT systems.
- Any personal information held in hardcopy format is held under lock and key with only authorised persons holding a key.

### **Data Retention**

We will only retain your personal information 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.

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.

### **What Are My Rights?**

Under the GDPR, you have the following rights, which are available in certain circumstances:

1. The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Section D.
2. The right to access the personal data we hold about you.
3. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Section D to find out more.
4. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Section D to find out more.

5. The right to restrict (i.e. prevent) the processing of your personal data.
6. The right to object to us using your personal data for a particular purpose or purposes.
7. The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
8. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Section D.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

**d) Finding out more**

If you have any questions about our privacy statement or the information we hold about you, please contact the Data Compliance Manager at the address above or per the under-noted contact details:

Email address: [euprivacy@crudeninvestments.co.uk](mailto:euprivacy@crudeninvestments.co.uk)

Telephone number: 0131 285 6600