

PRIVACY POLICY

Regal London takes your privacy seriously and is committed to protecting your personal data. This privacy notice describes how we collect and look after your personal data when you visit our website, our purposes for collecting and processing your information, how we use it and how we keep it secure.

This privacy notice covers eight specific areas, set out below.

1. WHO WE ARE
2. HOW IS YOUR PERSONAL DATA COLLECTED
3. THE DATA WE COLLECT ABOUT YOU
4. HOW WE USE YOUR PERSONAL DATA
5. WHO DO WE SHARE YOUR DATA WITH
6. DATA SECURITY
7. DATA RETENTION
8. YOUR LEGAL RIGHTS

WHO WE ARE

For the purposes of this policy, Regal London is the data controller and is responsible for your personal data (collectively referred to as “Regal Group”, “we”, “us” or “our” in this privacy notice).

Regal London comprises the below listed companies. (together “the Regal Group”). If you consent to us doing so, we may share your personal information within the Regal Group.

1SJW Management - Regal Homes Letts. & Man. Ltd	Regal Homes Construction Limited T/A Hamilton Construction
Adinheath Limited - Baridglen	Regal Homes Construction Ltd
Belmar Properties Ltd	Regal Homes HK Ltd
Cotterpark Properties Ltd	Regal Homes Management Ltd
Crosmay Ltd	Regal HW Limited
Gorsuch Street Development Ltd	Regal HWP Limited
Landwill Properties Ltd	Regal JP North Finchley Limited

Maceplace Investments Ltd	Regal LF Limited
Maceplace Ltd	Regal London Construction Ltd
MCM Property Management Ltd	Regal London Fields Limited
Megstone Limited	Regal London Fields Leasehold Limited
QCP Estates Limited	Regal London Properties Limited
Regal (Bedford Row) Limited	Regal NFR Limited
Regal (Wenlock Road) Limited	Regal Offices LLP
Regal B A Ltd	Regal One London Construction Limited
Regal Barkwest Limited	Regal Orchard Wharf Ltd
Regal Brondesbury Park Leashold Limited	Regal Property Investments Ltd
Regal Brondesbury Park Leashold TWO Limited	Regal Real Estates - GR
Regal Brondesbury Park Ltd	Regal Real Estates Ltd TRADING
Regal CFR Ltd	Regal Shanghai Ltd
Regal CH Ltd	Regal Three London Construction Limited
Regal Chalk Farm Ltd	Regal Two London Construction Limited
Regal Clarendon HQ Limited	Regal Wembley Ltd
Regal Clarendon Limited	Regal Wenlock (Leasehold) Ltd
Regal Clarendon Residential Limited	Regal WL Ltd
Regal Commercial Road Limited	Regal Workspace Ltd
Regal CR Limited	Regal WP Ltd
Regal Devonshire Limited	Regalbrook Holdings Limited
Regal Four London Construction Ltd	REP (Maygrove Road) Developments LLP
Regal GN Limited	Riverbee Ltd
Regal GNLP Limited	SJW Management Co Limited(Previous High Road One)
Regal High Road Limited	Tower Hackney Developments Ltd
Regal High Road Two Limited	Wadstone Properties Ltd
Regal Holdco Ltd	Regal MENA SPV Ltd

For all queries and issues regarding this policy, you can contact us by email at data@regal-london.co.uk or call us on +44(0)20 7328 7171.

HOW IS YOUR PERSONAL DATA COLLECTED

We obtain information about you when you visit our website* and register with us; when you contact us about properties and/or services; report a problem or if you register to receive our marketing communications.

We may also collect information about you from a few other sources, including:

- directly from you.
- our service providers.
- credit reference agencies.
- anti-fraud databases, sanctions list, court judgements and other databases.
- government agencies and publicly accessible registers or sources of information.
- social media outlets, including in the context of promotions that we operate.
- by actively obtaining your personal information ourselves, for example using website tracking devices or the information we collect through your use of our websites, services, and solutions; and/or
- through automated technologies or 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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below, some of which may be based outside the European Economic Area (EEA).

*Website refers to www.regal-london.co.uk and all associated Regal London websites including:

cube-building.co.uk	theclarendonworks.com
high-trees.co.uk	fultonfifth.com
regal-homes.co.uk	fultonfifth.co.uk
regal-london.cn	fultonfifthwembley.com
regal-london.co.uk	fultonfifthwembley.co.uk
regal-london.com	fultonandfifth.com

regal-london.me	fultonandfifth.co.uk
shoreditch-exchange.co.uk	fultonandfifthwembley.com
shoreditch-exchange.com	fultonandfifthwembley.co.uk
onestjohnswood.com	fultonandfifthlondon.com
onestjohnswood.co.uk	fultonandfifthlondon.co.uk
regal.co.uk	north-finchley.com
theclarendonwatford.co.uk	north-finchley.co.uk
clarendonwatford.co.uk	thisisnorthfinchley.com
clarendonwatford.com	thisisnorthfinchley.co.uk
theclarendonwatford.com	hydeparksquare.ae
thelaundry-e8.com	onestjohnswoodsquare.ae
thelaundry-e8.co.uk	onestjohnswood.ae
thelaundrybuilding.com	greatnorthernentertainment.co.uk
thelaundrybuilding.co.uk	greatnorthernentertainment.com
laundrybuilding.co.uk	greatnorthernentertainment.uk
thehaydon.co.uk	Onestjamesw1.co.uk
thehaydon.com	Onestjamesw1.com
thehaydonlondon.co.uk	Onestjamesw1.london
thehaydonlondon.com	Onestjamesw1.net
thehaydonaldgate.co.uk	Onestjamesw1.co
thehaydonaldgate.com	Onestjameslondon.co.uk
thehaydonec3.co.uk	Onestjameslondon.com
thehaydonec3.com	Onestjameslondon.net
theclarendonworks.co	Onestjameslondon.co
theclarendonworks.co.uk	

THE DATA WE COLLECT ABOUT YOU

Personal Data we collect about you may include the following:

Identity	Name, title, marital status, date of birth, gender, passport information, nationality.
Contact	Email addresses, postal addresses, billing address, landline and mobile telephone numbers.
Profile	Your preferences (including details about the type of property you are interested in), interests, profession, purchases, orders, requests, feedback, and survey responses.
Transactional	Details about payments to and from you and other details of properties, products, goods or services you have purchased from us or the Regal Group.
Financial	Mortgage application details, bank account, payment card details, and any other information provided to us for anti-money laundering checks.
Technical	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 this website.
Usage	Information about how you use our website(s)*, how you have interacted with us, information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
Marketing and Communications	Your preferences in receiving marketing from us and our third-party suppliers as well as your communication preferences.

HOW WE USE YOUR PERSONAL DATA

In the table below, we have summarised the ways that we plan to use your personal data and the purposes for which we will use it and the lawful basis for this. If we need to process your personal data for a different purpose that is not compatible with the original purpose, then we will let you know.

We may process your personal data for a different purpose than listed below and without your consent where it is necessary for us to comply with our legal obligations.

You may withdraw your consent at any time by contacting data@regal-london.co.uk, at which point we will cease to process your personal data for the purposes to which the consent applies.

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 via data@regal-london.co.uk 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.

Purpose / Activity	Type of Data	Lawful basis for processing including basis for legitimate interest
To contact you	Identity Contact Financial Transaction	Execution of responsibility as freeholder. Performance of a contract or potential contract with you. Necessary for our legitimate interests (for running our business, to keep our records updated, etc.).
To register you as a new customer	Identity Contact Profile Marketing and Communications	Performance of a contract or potential contract with you. Necessary for our legitimate interests (of our being able to keep records of our registered customers).
To facilitate the reservation, purchase, sale, renting, leasing, or licensing of a property.	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract or potential contract with you Necessary for our legitimate interests

<p>To facilitate the collection of service charge payments</p>	<p>Identity Contact Financial Transaction</p>	<p>Execution of responsibility as freeholder. Performance of a contract or potential contract with you. Necessary for our legitimate interests.</p>
<p>To verify your identity, verify your eligibility for certain services, conduct credit reference checks, prevent or detect fraud or money laundering.</p>	<p>Identity Contact Financial Transaction</p>	<p>Performance of a contract or potential contract with you. Necessary to comply with a legal obligation. Necessary for our legitimate interest (to prevent being defrauded).</p>
<p>To verify your identity in order to verify your eligibility for access to certain areas at our properties in order to prevent or detect unauthorised use (such as lease infringement)</p>	<p>Identity Contact Profile Financial Transaction Security Systems Special Categories</p>	<p>Execution of responsibility as freeholder. Performance of a contract or potential contract with you. Necessary for our legitimate interests (protection of property and security of estate).</p>

<p>To manage our relationship with you, including:</p> <p>Asking you to leave a review or take a survey or provide feedback on our services.</p> <p>Notifying you about changes to our terms or privacy notice.</p>	<p>Identity</p> <p>Contact</p> <p>Usage</p> <p>Profile</p> <p>Marketing and Communications</p>	<p>Performance of a contract or potential contract with you.</p> <p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests (to keep our records updated and to study how customers use our websites/services).</p>
<p>To provide customer support such as Sales services, Concierge and Front of House services, Helpdesk services, Security services, facilities services, parking services, etc.</p>	<p>Identity</p> <p>Contact</p> <p>Financial</p> <p>Usage</p> <p>Profile</p> <p>Security Systems</p> <p>Special Categories</p>	<p>Performance of a contract with you.</p> <p>Execution of responsibility as freeholder/ developer.</p>
<p>To provide our key authorisation service, allowing you to leave your keys with us for others to collect.</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p>	<p>Performance of a contract with you.</p>

	Security Systems	
To enable you to partake in events, competitions and surveys	Identity Contact Profile Usage Marketing and Communications	Performance of a contract or potential contract with you. Necessary for our legitimate interests (to develop and grow our business).
To administer and protect our business and network security including websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Identity Contact Profile Technical Usage Security Systems	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and unauthorised access). 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.	Identity Contact Profile	Necessary for our legitimate interests (to study how customers use our website/services, to develop them, to grow our business and to inform our marketing strategy).

	<p>Usage</p> <p>Marketing and Communications</p> <p>Technical</p>	
<p>To use data analytics to improve our websites, products/services, marketing, customer relationships and experiences.</p>	<p>Technical Usage</p>	<p>Necessary for our legitimate interests (to define types of customers based on their age, gender and interests for our products and services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy).</p>
<p>To ensure that content from our websites and our applications are presented in the most effective manner for you and your device.</p>	<p>Contact</p> <p>Financial</p> <p>Transaction</p> <p>Technical</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business and provision of administration and IT services).</p>
<p>To make suggestions, recommendations and provide information to you about goods or services that may be of interest to you</p>	<p>Identity</p> <p>Contact</p> <p>Technical</p> <p>Usage</p> <p>Profile</p>	<p>Necessary for our legitimate interests (to develop and grow our business)</p>

<p>To permit selected third parties:</p> <ul style="list-style-type: none"> · To provide you with information related to the delivery of services to residents (such as ground rent demands, energy billing, etc.) · to assist us in the improvement and optimisation of advertising, marketing material and content, our services and the websites / applications. 	<p>Identity</p> <p>Contact</p> <p>Transaction</p> <p>Usage</p> <p>Technical</p>	<p>Execution of responsibility as freeholder.</p> <p>Performance of a contract or potential contract with you.</p> <p>Necessary to comply with a legal obligation.</p> <p>Consent (in relation to SMS and email marketing communications and application notifications).</p> <p>Necessary for our legitimate interests (to deliver our services and to develop our business and improve our business).</p>
<p>To comply with requirements imposed by law or any court order.</p>	<p>Identity</p> <p>Contact</p> <p>Financial & Transaction</p> <p>Employment Related</p> <p>Technical</p> <p>Usage</p> <p>Security Systems</p> <p>Special Categories</p>	<p>Necessary to comply with our legal obligations</p>

WHO DO WE SHARE YOUR DATA WITH

Marketing and Communications

We will not share your information with third parties (for the avoidance of doubt other members of Regal London are not considered third parties) for marketing purposes unless you have given us your consent to do so, either when you first registered with us or at a later date. If, at any time, you want us to stop sharing your information please email us at data@regal-london.co.uk or write to us at Data Protection Officer, Regal HoldCo Ltd, 4-5 Coleridge Gardens, London NW6 3QH.

Third Parties

We may also share your personal data with external third parties, such as:

- Estate agents acting as processors, such as Savills, Foxtons, CBRE, Knight Frank, JLL based both within and outside the EU who provide property marketing services.
- Managing agents acting for us or the Regal Group company that you have a contract with, who provide management services to Regal branded or co-branded properties.
- Property related businesses acting as processors for us, such as property managers and furniture providers based in the United Kingdom (subject to your consent).
- Professional advisors acting as processors for us or the Regal Group that you have a contract with including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- Service providers acting as processors for us or the Regal Group company that you have a contract with who provide database, IT and system administration services, some of which are based in the USA.
- Freeholders of the properties in which you live, or own, or other companies within the property-owning structure of your property.
- Marketing, communication and survey providers / advisors acting as processors for us or the Regal Group company that you have a contract with.
- HM Revenue & Customs, National Crime Agency, local authorities, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Banks and payment processing companies who complete financial transfers and transactions.
- Anti-money laundering agencies, which may be based outside of the EU.
- Human resources consultants who provide advice and support to Regal and its employees relating to matters of employment law.
- Maintenance contractors and service providers who undertake a range of activities for us or the Regal Group company that you have a contract with, such as maintenance on building services and systems, security services, billing services, etc.

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- 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.

International Transfers

Your information may be transferred to countries outside of the UK as part of running our business. Where we transfer your personal information across national boundaries, we will protect your personal information by ensuring that those transfers are made in compliance with all relevant data protection laws. For example, where we transfer personal information from the UK to a country outside of the UK that is not recognised by the UK as providing an adequate level of data protection, we normally do so subject to safeguards that assure the protection of your personal information, such as standard contractual clauses approved by the UK. If you would like further details of how your personal information is protected when transferred from one country to another, then please contact us.

DATA SECURITY

When you give us personal information, we take steps to ensure that it's treated securely. We use strict procedures and security features to try to prevent unauthorised access.

Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

DATA RETENTION

We will hold your personal information on our systems for as long as is necessary for the relevant activity in line with our data retention policy. Our retention periods are based on the requirements of relevant data protection laws and the purpose for which the information is collected and used, considering legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice, and our business purposes. We review our retention periods for personal information on a regular basis.

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers. To the extent that we are your landlord (e.g., as freeholder), we will keep your information as long as this is the case and for a further six years (or longer if required for our records or for legal reasons). In some circumstances you can ask us to delete your data (see the next section 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.

YOUR LEGAL RIGHTS

Your choices

You have a choice about whether or not you provide us with your personal information. Where we need to collect your personal information by law or in order to process your instructions, provide you with our services or perform a contract we have with you and you decide not to provide that information when requested, we may not be able to carry out your instructions, provide our services or perform the contract we have or are trying to enter into with you. In other circumstances where you choose not to provide us with your personal information we request, your decision not to provide us with your personal information may affect our ability to provide certain of our services.

In particular, you have a choice about whether or not you wish to receive direct marketing information from us. If you do not want to receive direct marketing communications from us about our exciting properties, our exclusive events, offers and all our latest development news then you can make this clear to us when you first register with us. If you consent to our marketing, but later change your mind, then you can opt out and withdraw your consent at any time.

We will not contact you for marketing purposes by email, WhatsApp, WeChat, telephone, post or text message unless you have given us your express prior consent to do so. You can change your marketing preferences and/or unsubscribe and withdraw your consent at any time by contacting us by email; data@regal-london.co.uk or by telephone on +44(0)20 7328 7171.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose(s) to which you originally consented.

How you can access and update your information

We are obliged to keep your personal information accurate and up to date and the accuracy of your information is important to us. We are continuously working on ways to make it easier for you to review and correct the information that we hold about you.

If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at data@regal-london.co.uk or call us on +44(0)20 7328 7171.

How can you opt out of marketing

We only directly market to you by text or emails where it is legally allowed, for example where you have consented or where you have purchased (or negotiated to purchase) from us and did not chose to opt out. When directly marketing to you we may use a combination of the data we hold about you to form a view on what we think you would be interested in.

We only want to market to users who want to hear from us. You can ask us to stop sending you marketing messages at any time by:

- Selecting the opt-out link on any marketing message sent to you.
- Emailing data@regal-london.co.uk with your request; or
- Writing to the address mentioned at 'How to contact us?' section.

If you do opt-out of marketing from us, please note that we may still need to contact you for reasons other than direct marketing (for example to carry out anti-money laundering checks where you are buying a property from us, or to arrange aftercare services to be provided during any warranty period you may benefit from).

If you are not opted-in for marketing and would like to be, please follow this link to get in touch: <https://www.regal-london.co.uk/contact-us-regal-london/>

In certain circumstances you may have given consent for us to pass your contact details to a third party so that they can offer their products or services to you. Where you have done so but no longer want to receive communications from them, you can contact them directly to opt-out.

Your rights

Under certain conditions, you may have the right to require us to:

- provide you with further details on the use we make of your personal information.
- provide you with access to the personal information we hold about you.
- update any inaccuracies in the personal information we hold about you.
- delete any of your personal information that we no longer have a lawful ground to use.
- where processing is based on consent, stop that processing by withdrawing your consent.
- object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights.
- restrict how we use your personal information whilst a complaint is being investigated.
- transfer your personal information to a third party in a standardised machine-readable format.

In certain circumstances, we may need to restrict your rights to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege).

Complaints

You have the right to lodge a complaint with the Information Commissioner's Office in the UK if you think we have acted improperly in relation to your personal data. You can find a link to the Information Commissioner's website here: www.ico.org.uk.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in August 2023.