

# Ambassador Regency Group Privacy Policy

#### Who we are

This is the privacy statement of Ambassador Regency Group (**Group**) and it explains how the Group collects and uses personal information about you through your use of our website and through other interactions with us.

The Group is made up of different legal entities, details of which can be found below. This privacy policy is issued on behalf of the Group. The Group comprises (in addition to its holding companies):

- an individual company in respect of each development we run (each a **Development** Company), which owns the land that you have the right to occupy under your site licence, and which is the data controller for the purpose of entering into the site licence agreement (and related arrangements) with you; and
- 2) Ambassador Regency Limited, a sister company to the Development companies (**Regency Living**), which is the data controller for the purpose of managing each development.

When we mention, "we", "us" or "our" in this privacy policy, we are referring to Ambassador Regency Limited and the relevant Development Company in the Group who is responsible for processing your data.

## **Our intent**

We are committed to safeguarding the privacy of users to our site and we will only use the information that we collect about you lawfully and in accordance with all applicable data protection laws.

## What information do we collect about you and why?

We may collect, use and store different types of personal information about you, which we have grouped together as follows:

Types of Personal Information	Included Information
Contact Data	Includes residential address, email address and telephone number



Identity Data	Includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
Contractual Information	Information obtained by providing our services to you.
Marketing and Communications Data	Details about your preferences in receiving marketing communications from us
Financial Data	Includes bank account details where payments are taken by standing order.
Technical Data	Includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.

# How do we collect your personal information?

We may collect personal information about you from the following sources:

- Data you give to us: when you make an enquiry on our website or correspond with us by post, phone, email or otherwise.
- Data we collect when you enter into a contract with us: we will collect further personal information including but not limited to your date of birth, address, your ID documentation, email address and telephone number.
- Data from third parties that we work with such as Rightmove Limited, Sell My Group Ltd and Park Home Living Limited.
- Contact Data is collected from providers of technical, payment and delivery services.
- Consent: we rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.



- Identity and Contact Data is collected from publicly available sources such as Companies House and the Electoral Register based inside the UK.
- Technical Data is collected by the following methods:
  - Our website uses the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site. You can set preferences regarding the way in which Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of third party vendors' use of cookies by visiting the Network Advertising Initiative opt out page.
  - Our website uses Google Analytics and Google Ads to track user behaviour when spending time on this site and for remarketing purposes to serve ads online to previous visitors.
  - Third-party vendors, including Google, use cookies to serve ads based on a user's past visit to the Regency Living site. Ads can be served to you as you continue to browse online and visit other sites across the Internet. Ads may be specific to actions that you have taken on the site, e.g. if you have completed an enquiry form. You can opt out of being served ads by re-configuring your Google Ad Settings or by visiting the Network Advertising Initiative opt out page.
  - Our website uses the Facebook/Meta Pixel to track user behaviour when spending time on this site and for remarketing purposes to serve ads online to previous visitors.
     You can find out more about how Meta use this information and how you can control access here: <a href="https://www.facebook.com/privacy/center/">https://www.facebook.com/privacy/center/</a>.

# How we use your personal data

#### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- Performance of a contract with you: where we need to perform the contract we are about to enter into or have entered into with you.
- Legitimate interests: we may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).
- Legal obligation: we may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.



# Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of 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.

Purpose/Use	Type of data	Legal basis
To respond to your request for	(a) Identity Data	(a) Performance of a contract with you
information regarding our	(b) Contact Data	(b) Necessary for our legitimate
property types and	(c) Marketing and	interests (to recover debts due to us)
developments	Communications Data	
Enter into and perform	(a) Identity Data	Performance of a contract with you.
contracts in connection with	(b) Contact Data	
the sale of our properties		
To deliver services to you order	(a) Identity Data	(a) Performance of a contract with you
including:	(b) Contact Data	(b) Necessary for our legitimate
(a) Updating you on proposed	(c) Financial Data	interests (to recover debts due to us)
works and site maintenance		
(b) Manage payments, fees		
and charges		
(c) Collect and recover money		
owed to us, including sending		
reminder letters for accounts		
that are in arrears.		
To manage our relationship	(a) Identity Data	(a) Performance of a contract with you
with you which will include:	(b) Contact Data	(b) Necessary to comply with a legal
(a) Notifying you about	(c) Marketing and	obligation
changes to our terms or	Communications Data	(c) Necessary for our legitimate
privacy policy		interests (to keep our records updated
(b) Dealing with your requests,		and manage our relationship with you
complaints and queries		
To administer and protect our	(a) Identity Data	(a) Necessary for our legitimate
business and this website	(b) Contact Data	interests (for running our business,
(including troubleshooting,	(c) Technical Data	provision of administration and IT
data analysis, testing, system		services, network security, to prevent
maintenance, support,		fraud and in the context of a business
reporting and hosting of data)		reorganisation or group restructuring
		exercise)
		(b) Necessary to comply with a legal
		obligation



Purpose/Use	Type of data	Legal basis
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data (d) Technical Data	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)
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical Data	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 send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity Data (b) Contact Data (c) Technical Data (d) Marketing and Communications Data	Consent, having obtained your prior consent to receiving direct marketing communications
To carry out market research through your voluntary participation in surveys	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data	Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).

## **Data Retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. Our internal data retention policies are reviewed regularly. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.



# **Direct marketing**

During the registration process on our website or following an initial enquiry from you received otherwise than via our website, you will be asked to indicate your preferences for receiving direct marketing communications from us via email phone, post or text.

We may also analyse your Identity, Contact and Technical Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

#### Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

## Opting out of marketing

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example circulating sales documentation, sending you invoices and other communications relating to the services we offer you (for example to inform you of power outages, proposed site works and communications related to land owner obligations).

#### Cookies

For more information about the cookies we use and how to change your cookie preferences, please see <a href="Cookie Policy">Cookie Policy</a> | Regency Living.

#### Who do we share your information with?

If you reserve one of our properties, we may pass your personal information on to any or all of the following parties for the purposes set out in the table above:

- our sales agents where they have supplied your information to us;
- our part exchange provider, Spring Operations Limited (Spring) for the purpose of making an introduction, where you have indicated that you would like to obtain a valuation from Spring and we have obtained your prior consent to share your name and contact details with them (a copy of Spring's privacy notice can be found here <a href="Privacy Policy How We Use Your Personal Information">Privacy Policy How We Use Your Personal Information</a> | Spring);



- our professional advisors for the purposes of processing the transaction;
- legal entities within the Group, details of which can be found below; Specifically, data is shared between Regency Living and the Development Companies to facilitate the management of the sites and entering into contractual arrangements with you;
- any contractor to which we have outsourced the operation of any part of our business or
  which we have appointed to provide services to support any part of our business, including
  but not limited to, providing customer aftercare and rectifying snagging issues; and
- any third parties that legally require us to share your personal information.

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.

We do not transfer your personal data outside the UK.

#### **Data Security**

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.

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.

# How long do we keep your personal information?

We will not retain your personal information for longer than is necessary for the purpose for which the information was collected. Details of retention periods for different aspects of your personal data are set out in the table Purposes for which we will use your personal data above.

# Your rights

**Access to your information** – You have the right to request a copy of the personal information about you that we hold.

**Correcting your information** – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

**Deletion of your information** – You have the right to ask us to delete personal information about you where:

• You consider that we no longer require the information for the purposes for which it was obtained



- We are using that information with your consent and you have withdrawn your consent see Withdrawing consent to using your information below
- You have validly objected to our use of your personal information see Objecting to how we may use your information below
- Our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information** – You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or pursuant to the legitimate interests of us or a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

**Automated processing** – if we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you

**Withdrawing consent using your information** – where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Please contact us using the details set out in the Contact section if you wish to exercise any of these rights.

# Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

This privacy statement was last updated in January 2025.

#### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@regency-living.co.uk.

#### **Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues:

Online: <a href="https://ico.org.uk/global/contact-us/contact-us-public/">https://ico.org.uk/global/contact-us/contact-us-public/</a>

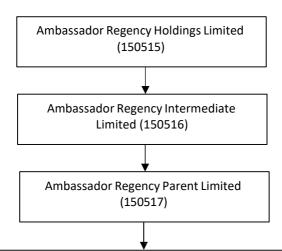
By phone: <u>0303 123 1113</u>

By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF



We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

# Regency Group Structure



# **Subsidiaries of Ambassador Regency Parent Limited**

Ambassador Regency Limited (15107553)

AR (Boarhunt) Limited (15107549)

AR (Christchurch Marina) Limited (15107545)

AR (Christchurch) Limited (15107717)

AR (Deers) Limited (15107513)

AR (Dolbeare Park) Limited (15107498)

AR (Dunton Park) Limited (15107543)

AR (Forest Edge) Limited (15107701)

AR (Fort Park) Limited (15107502)

AR (Frensham) Limited (15107481)

AR (Home Estates) Limited (15107495)

AR (Manor Farm) Limited (15107522)

AR (Meadowlands) Limited (15107501)

AR (New Forest) Limited (15107497)

AR (North Lodge) Limited (15107546)

AR (Oaktree) Limited (15107491)

AR (Oakwood) Limited (15107703)

AR (Ranksborough) Limited (15107538)

AR (Reculver) Limited (15107550)

AR (Redhill) Limited (15107698)

AR (Regency Heights) Limited (15107720)

AR (Regency) Limited (15107484)

AR (Rochester) Limited (15107721)

AR (Sherwood) Limited (15107541)

AR (Silver Mists) Limited (15107530)

AR (Solent Grange) Limited (15107695)

AR (Stroud Heights) Limited (15107519)

AR (Village Way) Limited (15107525)

AR (Warrington) Limited (15107547)

AR (Waterside) Limited (15107534)

AR (Waterways) Limited (15107707)

AR (Wickham) Limited (15107488)