

# **Privacy Policy & Cookies**

At Hilton Homes UK we respect privacy and your rights to control your personal data. We will be clear about the data we collect and why. We do not and will not sell your data to second or third parties.

Our purpose for collecting your data is to improve your overall experience with Hilton Homes UK.

The following Privacy Statement (the 'Statement') will explain what personal information we collect from you, either directly or indirectly, and how we use it. Personal information is any information that can be used to identify you or that can be linked to you. The Statement also covers the choices you can make about the data we collect, and how you can control these decisions. It applies to all products offered by Hilton Homes UK. It also applies to any Hilton Homes UK controlled websites, as well as other interactions you may have with Hilton Homes UK. Please read this Statement carefully to understand how Hilton Homes UK may collect, use and share your personal information. The terms 'we', 'us', or Hilton Homes are each intended as reference to Hilton Homes UK Ltd.

# The Types of Personal Information We Collect

# Information you provide to us

We collect information you voluntarily provide to us, such as your name, phone number, email address, home address and country of residence; for instance, when you want to learn more about Hilton Homes UK Products and Services or when you contact our team.

# Information we collect automatically

The current Hilton Homes website does not collect Information by cookies or similar technologies.

#### Information obtained from other sources

We may receive information about you from other sources, including second or third parties, such as estate agents or solicitors. We may also receive information about you from social media platforms, for instance, when you interact with us on those platforms. We protect data obtained from second or third parties according to the practices described in this Statement and we also apply any additional restrictions imposed by the source of data.

#### Information of children

Hilton Homes does not target and is not intended to attract children under the age of sixteen. Although visitors of all ages may navigate through our websites, we do not knowingly collect or request personal information from those under the age of sixteen without parental consent.

# **Customer Interactions with Hilton Homes**

To make the information in this Statement easy to understand, we have highlighted different occasions when Hilton Homes could potentially collect personal information from customers. The customer interactions with Hilton Homes are broken down into the following segments:

# Learning about Hilton Homes

As you gather more information about Hilton Homes, you may virtually or physically visit a site that we own. Examples include browsing our website, calling our sales representatives, physically visiting or attending our offices or building sites. To learn more about Hilton Homes Products, you may voluntarily provide personal information, such as your name and email address during these interactions. We do not however currently collect information about you online via cookies or similar technologies when you visit our websites.

**We collect:** name, email address, country of residence.

**Why:** We use this information to directly contact you regarding current projects and products offered by Hilton Homes. Additionally, the country of residence helps us to understand geographic information about our website visitors better, so that we can improve our website for everyone. It is our legitimate interest to process your personal data for these purposes.

# Getting Help from Hilton Homes

From time to time, you may decide to contact our service team for assistance with your Hilton Home. To be able to offer you the best service possible, we may collect certain data from you..

**We collect:** This may include contact information, such as your name, email address, phone number, social media identifiers (if you contact us using a social media channel), and the content of your chats and other communications with the Hilton Homes team.

**Why:** We collect this information to give you the best and most efficient customer support possible. For instance, for customer inquiries and technical questions, we use contact information to respond to the customer in their preferred channel (phone, email, social). Using these types of data is necessary to fulfil the agreement we have with you.

# **How We Use Personal Information**

Hilton Homes uses the data we collect to provide you with the Products and Services we offer, which includes using data to improve and personalise your experiences. We also use the data to communicate with you, for example, informing you about your property, security and other types of updates.

Hilton Homes uses the data for the following purposes:

- Customer Support
- Security, Safety, and Dispute Resolution
- Business Operations
- Communication

#### **Customer Support**

We use data to respond to customer enquiries, diagnose problems, remedy any structural or cosmetic issues identified with our products and provide other customer care and support services. This processing is necessary for the performance of the agreement we have with you, as well as to serve our legitimate interest.

### Security, Safety and Dispute Resolution

We use data to protect the security and safety of our Products and our customers, to detect and prevent fraud, to resolve disputes and enforce our agreements. This processing is necessary to serve our legitimate interest.

### **Business Operations**

We may use data to develop aggregate analysis and business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of our business. This processing is necessary to serve our legitimate interest.

#### Communication

We use the data we collect to deliver and personalise our communications with you. This processing is necessary to serve our legitimate interest.

To give you a better understanding of the personal information we collect and use in different occasions you may interact with Hilton Homes, please see the sections below.

# **How We May Share Personal Information**

Hilton Homes does not and will not sell personal information about our customers. We only disclose your data as described in this Statement. We may share information with the following types of second or third parties.

# Second Party Vendors (Subcontractors)

Hilton Homes uses a network of second party subcontractors. Customer Support data will be shared with these subcontractors where essential works are required to remedy any issues with your new home. The provided data may then be shared with local tradesmen to provide Customer Support in performance of the agreement we have with you. In this case, your personal information will be shared with these agents or contractors but only for the purpose of performing services on behalf of Hilton Homes and in accordance with this Statement.

# **Third Party Vendors**

Hilton Homes uses a limited number of third-party vendors to carry out services like website management and hosting, email communications, and accountancy processing. We only share your personal data as necessary. To complete a transaction, provide a Product or Service you have requested or authorised and only with vendors or agents working on our behalf for the purposes described in this Statement. In this case, your personal information will be shared with these agents or contractors but only for the purpose of performing services on behalf of Hilton Homes and in accordance with this Statement.

It is our legitimate interest to process your personal data for these purposes. For questions about third-party vendors, please send an email to accounts@hiltonhomesuk.co.uk.

# Compelled Disclosure

When legally required, strictly necessary for the performance of the services or to protect our rights, or the rights of our affiliates or users, we disclose your personal information to law enforcement authorities, investigative organisations, our affiliates or in legal proceedings.

# Sale or Merger

We may share your personal information in the event of a merger, acquisition, or sale of all or a portion of our assets. Of course, we shall notify you via email and/or a prominent notice on our website and inform you of your rights.

# The Legal Bases for Using Personal Information

There are different legal bases that we rely on to use your personal information, namely:

#### Performance of a contract

The use of your personal information may be necessary to perform the agreement you have with us. For example, to help with issues and to make sure that your Hilton Homes is to the agreed specification or to respond to your requests.

#### Legitimate interests

We may use your personal information for our legitimate interests. For example, we rely on our legitimate interest to analyse and improve our Products and Services and

the content on our websites, or to use your personal information for administrative, fraud detection or legal purposes.

Where we process your personal information based on our legitimate interest and no opt-out mechanism is available to you, you may exercise your right to object by sending an email to accounts@hiltonhomesuk.co.uk.

# Security, Storage and Retention of Personal Information We Collect

# Security

Hilton Homes is committed to protecting the security of your personal information. However, while we take reasonable precautions to guard the personal information we collect, no security system is impenetrable.

While no Service is completely secure, Hilton Homes takes precautionary measures to help prevent information about you from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction. For example, we store the personal data you provide on computer systems that have limited access and that are in controlled facilities.

We also ensure that our second or third-party data centre vendors provide adequate security measures. Additionally, your data is protected with encryption, such as HTTPS encryption, during transition over the Internet. If you have any questions about the security of your personal information, you can contact us at accounts@hiltonhomesuk.co.uk.

### Storage

Personal data collected by Hilton Homes may be stored and processed in your region. Hilton Homes does not operate outside of this region.

#### Retention

Hilton Homes will retain your personal information for as long as we deem it necessary to enable you to use the website and any Products or services provided to you, to comply with applicable laws (including those regarding document retention), resolve disputes with any parties and otherwise as necessary to allow us to conduct our business. All personal information we retain will be subject to this Privacy Statement and our internal retention guidelines. If you have a question about a specific retention period for certain types of personal information we process about you, please send an email to accounts@hiltonhomesuk.co.uk.

# **Your Rights and Choices**

# Your Rights

We want you to be in control of how your personal information is used by us. Subject to local law, you can do this in the following ways:

- you can ask us for a copy of the personal information we hold about you;
- you can inform us of any changes to your personal information, or if you want us to correct any of the personal information we hold about you;
- in certain situations, you can ask us to erase, block or restrict the personal information we hold about you, or object to particular ways in which we are using your personal information; and
- in certain situations, you can also ask us to send the personal information you have given us to a second or third party.

Where we are using your personal information on the basis of your consent, you are entitled to withdraw that consent at any time. Moreover, where we process your personal information based on legitimate interest or the public interest, you have the right to object at any time to that use of your personal information.

We rely on you to ensure that your personal information is complete, accurate and up to date. Please do inform us promptly of any changes to or inaccuracies in your personal information by contacting accounts@hiltonhomesuk.co.uk.

We will respond to your request as soon as possible but certainly within 30 days. For more information about how you can control the collection and use of your data, please visit Your Choices sections below.

We are committed to working with you to obtain a fair resolution of any complaint or concern you may have about our use of your personal information. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to file a complaint with the data protection authority in your country (if one exists in your country) or supervisory authority.

# **Our Use of Cookies and Other Technologies**

We do not use cookies or similar technologies like pixels, tags, web beacons, and other identifiers.

# Advertising and Modern Marketing Tools

Hilton Homes does not work with third-party advertisers that use cookies and similar technologies on our websites and across the Internet.

#### How to Contact Us

If you have any questions about the use of your personal information, please email accounts@hiltonhomesuk.co.uk.

Unless otherwise stated, Hilton Homes UK Ltd. is a data controller for personal data we collect through the Hilton Homes UK ltd Products and Services subject to this Privacy Statement. Our business address is Oakfield, St Peter's Road, Hockley, SS5 6AA.

# **Changes to Our Privacy Statement**

Hilton Homes may modify or update this Statement when necessary, to reflect customer feedback and changes in our Hilton Homes Products and Service. Please review it regularly. When we update this Statement, we will revise the 'Last Update' date at the top of the Statement. If there are material changes to the Statement or in how Hilton Homes uses your personal data, we will inform you either by posting a notice of such changes, prior to them taking place, or by directly sending you a notification. We encourage you to regularly review this Statement to learn more how Hilton Homes is using and protecting your information.

# **FAQs**

The following are basic questions you may have about our privacy statement. We recommend that you read the detailed statement above for additional details.

# Why is Hilton Homes updating its privacy statement?

We now meet the high standards required by the European Union's General Data Protection Regulation (GDPR) and have updated our privacy statement to reflect that. We also strive to simplify language and remove jargon, to make our privacy statement easier to read and understand.

#### What is the GDPR?

The GDPR is a regulation intended to strengthen and unify data protection for everyone within the European Union (EU). As we believe that all our customers can benefit from its mandates, we're implementing it globally. The GDPR requires greater openness and transparency from companies on how they collect, store and use personal data, while also imposing tighter limits on the use of personal data. You can learn more here.

# How often do you anticipate updating your privacy statement?

We will update our privacy statement as necessary to ensure that our policies are in line with international regulations, our product and business practices.

#### What information does Hilton Homes collect about me?

Hilton Homes collects your name, email address, phone number, delivery address, payment information, location data, and social identifiers.

# Why does Hilton Homes need my information?

Hilton Homes uses data to provide you with the best experience from the products and services we offer, which includes using data to improve and personalise your experiences. We also use data to communicate with you.

# How is my information used?

Hilton Homes uses data for the following purposes:

- Customer Support
- Security, Safety, and Dispute Resolution
- Communication

# Does Hilton Homes sell information to second or third parties?

No. We never have. And we never will.

# How do I request to access, amend or remove my personal data from Hilton Homes?

You can always send us an email via accounts@hiltonhomesuk.co.uk or contact our Customer Service team to request that your data be sent to you, or to be amended/removed in our database.

We will respond to any request to access, amend or delete your personal data as soon as possible, certainly within 30 days.

# Does Hilton Homes keep or share my credit card information?

No. It's only used to process your payment at the time of purchase.

# How long does Hilton Homes keep my information?

Hilton Homes retains personal data for as long as necessary to provide Services, support your Product and fulfil transactions you have requested, or for other essential purposes such as complying with our legal obligations, and resolving disputes and enforcing our agreements. Because these needs can vary for different data types in the context of different Products or Services, actual retention periods can vary significantly. For example, we will keep all functional data on file as long as you remain in your Hilton Home.

### How is information stored and secured on Hilton Homes servers?

Hilton Homes is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access, use or disclosure. For example, we store the personal data you provide on computer systems that have limited access and are in controlled facilities. Any data we transmit over the internet is protected, using encryption.

Is Hilton Homes using cookies or pixels to gather information? No.

Does Hilton Homes use interest-based advertising? No.

# What safeguards are in place for children who have access to Hilton Homes products?

Hilton Homes does not target and is not intended to attract children. Hilton Homes does not knowingly solicit personal information from children or send them requests for personal information. Although visitors of all ages may navigate through our website, there is no facility on Hilton Homes' website to collect personal information of any sort, excluding the use of cookies.

# How can I contact Hilton Homes if I have questions regarding Hilton Homes privacy statement?

If you have any questions about the use of your personal information, please send us an email to accounts@hiltonhomesuk.co.uk.