* Telford Homes Ltd. Residential property reservation Privacy Notice

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This Telford Homes Ltd. Privacy Notice (“**Notice**”) is issued by Telford Homes Ltd. (“**Telford**”), a member of the CBRE Group (“**CBRE**”) to assist you in understanding our data collection and handling practices when you reserve a residential property (the “**Property**”) with Telford Homes Ltd.

This Notice is also intended to assist you in making informed decisions and exercising your data privacy rights under applicable law.

Whenever this Notice refers to “Telford”, “we”, “us” or “our”, it refers to Telford Homes Ltd.

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# SUMMARY of key information

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| --- | --- |
| SCOPE | This Notice applies to the personal information relating to your reservation for purchase of a Property with Telford Homes Ltd. |
| responsible ENTITY / DATA CONTROLLER | Telford homes Ltd. is the data controller.  See details below in [Information about the Responsible CBRE Entity / Data Controller](#_Information_About_the). |
| PERSONAL INFORMATion we collect / SourceS | We collect and process personal information directly from you or from any party acting for or on your behalf in relation to your reservation and/or purchase of the relevant Property, including your solicitor or any co-purchaser.  See details below in [Personal Information We Collect and Sources](#_Personal_Information_We). |
| use of your personal INFORMATion and Legal Bases | * **To** **reserve** **the Property in your name**, where necessary, we process your Basic Data, Solicitor’s Details, and Reservation/Purchase Information, based on your request that we take steps to reserve the Property in order to facilitate your purchase of the same and/or based on your consent (if required by law). * **To communicate with you** about your reservation of the Property and the purchase transaction for the Property, we process your Basic Data, based on request that we take steps to reserve the Property in order to facilitate your purchase of the same, and/or based on your consent (if required by law). * **To manage our business operations and administer our client relationships**, we use Basic Data, in order to perform our obligations under our contracts with our clients. * **To provide you with relevant marketing**, such as providing you with information about events or services that may be of interest to you including our service and property offerings, incentives, newsletters events, and groups of specific interest (e.g. specific types of networking groups), we process your Basic Data. We process this personal information where necessary based on the overriding legitimate interests of CBRE to process this information in order to provide you with tailored and relevant marketing, updates and invitations or based on your consent (if required by law). * **To** **establish, exercise or defend our legal rights, to comply with lawful government requests for disclosure of personal information or otherwise to comply with legal obligations**, we use any of the personal information we collect about you where legally permissible to do so. We process this personal information where necessary to comply with Telford’s or CBRE’s legal obligations or for other overriding legitimate business interests.   See details below in [Use of Personal Data](#_Use_of_Personal). |
| data SHARING | We share your data with third party service providers and other third parties as may be necessary to administer your reservation and/or purchase of the Property  See details below in [Sharing of Personal Data](#_Sharing_of_Personal_1). |
| DATA RETENTION | We retain the personal information we collect about you for as long as necessary for the purpose for which that information was collected or as otherwise legally required. See details below in [Retention of Personal Data](#_Retention_of_Personal). |
| DATA SECURITY | We implement appropriate technical and organizational security measures to safeguard the personal information we collect and process about you against loss and unauthorized alteration or disclosure. See details below in [How We Secure Your Personal Information](#_Your_Data_Protection). |
| INTERNATIONAL DATA TRANSFERS | We may share your personal information with other CBRE Group entities and service providers located outside of your home country. When doing so, we provide appropriate safeguards for international data transfers as required by applicable law. See details below in [International Data Transfers](#_Your_Data_Privacy). |
| PRIVACY RIGHTS | Depending on the laws in your country, you may have certain rights to request access, rectification, deletion, objection, or other actions regarding your personal information. See details below, including how to exercise any privacy rights you may have under applicable law, in [Your Data Privacy Rights](#_Your_Data_Protection). |
| contact Telford | You are always free to contact us if you have questions or concerns about this Notice or our personal information collection and processing activities. See details below in [Contact Telford](#_Contact_CBRE). |
| Data Protection Officer | Where required by law, we have appointed a data protection officer whose contact details are disclosed in this Notice. [Click here to learn more.](#_Data_Protection_Officers) |
| Changes to this Notice | If we make any material changes to this Notice, we will make changes here and, if the changes are significant, we will provide a more prominent notice. Where required, we will obtain your consent. See details below in [Changes to this Notice](#_Changes_to_this). |

# Full Notice

## Information About the Data Controller

Depending on the legal regulations in your country and the applicable laws to which you are subject (such as in the EU/EEA and UK), you may have the right to information on the entity responsible for collecting and processing your personal information (also known as the data controller in some jurisdictions). Telford Homes Ltd. is the Data controller.

## Personal Information We Collect and Sources

### Categories of Personal Information We Collect

Where we may lawfully do so under applicable law, we collect the following categories of personal information directly from you or from other sources, such as from your solicitor our any co-purchaser (for more information on data sources, see [**Sources from Whom We Collect Personal Information**](#_Sources_From_Whom), below).

* **Basic Data:** such as your name, gender, title, phone number, mailing address, email address, contact details.
* **Solicitor’s Details:** such as your solicitor’s name, address, phone number, and email address.
* **Reservation/Purchase Information:** such as the development name, plot number, address, and details related to the property you have reserved or purchased, and details of the purchase price agreed for such property, including information about discounts and deposits.

### Special Categories of Personal Information

We do not collect or process any Special Category Personal Information (as defined in applicable law) in relation to your reservation of the Property.

### Sources From Whom We Collect Personal Information

We collect and process personal information directly from you or from any party acting for or on your behalf in relation to your reservation and/or purchase of the relevant Property, including your solicitor or any co-purchaser.

### Consequences of Not Providing Personal Information

If you do not provide the requested personal information, we will not be able to reserve the Property in your name and/or complete the transaction for purchase of the Property.

## Use of Personal Information and Legal Bases

The purposes for which we use your personal information and the legal bases for such processing are as follows:

* **To** **reserve** **the Property in your name**, where necessary, we process your Basic Data, Solicitor’s Details, and Reservation/Purchase Information **.** We process this personal information based on your request that we take steps to reserve the Property in order to facilitate your purchase of the same and/or based on your consent (if required by law).
* **To communicate with you** about your reservation of the Property and the purchase transaction for the Property, we process your Basic Data.We process this personal information based on your request that we take steps to reserve the Property in order to facilitate your purchase of the same and/or based on your consent (if required by law).
* **To manage our business operations and administer our client relationships**, we use Basic Data. We process this personal information where necessary in order to perform our obligations under our contracts with our clients .
* **To provide you with relevant marketing**, such as providing you with information about events or services that may be of interest to you including our service offerings, newsletters, client conferences or networking events, and groups of specific interest (e.g. specific types of networking groups), we process your Basic Data. We process this personal information where necessary based on the overriding legitimate interests of CBRE to process this information in order to provide you with tailored and relevant marketing, updates and invitations or based on your consent (if required by law).
* **To** **establish, exercise or defend our legal rights, to comply with lawful government requests for disclosure of personal information or otherwise to comply with legal obligations**, we use any of the personal information we collect about you where legally permissible to do so. We process this personal information where necessary to comply with Telford’s or CBRE’s legal obligations or for other overriding legitimate business interests.

### Legitimate Business Interests

To the extent Telford relies on its overriding legitimate business interests for the processing of your personal information, such business interests are in particular:

provide our clients with tailored and relevant marketing, updates and invitations.

establishing, exercising or defending our legal rights and claims.

### Automated Decision-Making

Telford does not process any personal data it collects and processes in relation to your reservation and/or purchase of the Property to make automated decisions.

## Sharing of Personal Information

Where we can do so lawfully under applicable law, the personal information we collect may be shared and processed with the following categories of recipients, some of whom may be located in a country that does not provide an adequate level of data privacy and protection rights as your home country, as necessary for the purposes identified in [Section 3 – Use of Personal Information](#_Use_of_Personal) and Legal Bases, above. CBRE has in place appropriate safeguards regarding internal personal information sharing. See [International Data Transfers](#_International_Data_Transfers) below for more information.

### Internally with Other CBRE Entities

Telford is a member of a global firm and the personal information we collect, or you provide may be shared and processed with CBRE entities as necessary for the purposes identified in [Section 3 – Use of Personal Information](#_Use_of_Personal) and Legal Bases, above. The potentially relevant CBRE entities are identified in [Appendix 1](#_Appendix_1). In particular:

* As part of Telford’s business, the CBRE global matrix structure may require that your personal information is transferred to other CBRE entities outside your home country where other CBRE employees who are responsible and accountable for maintaining the CBRE Group Digital and Technology Infrastructure are located (e.g., regional Digital & Technology and Information Security departments.

### With Third-Parties

The potentially relevant third-parties include:

* **Service Providers** who assist us with, IT, cyber security and data hosting providers.
* **Insurers, brokers and/or loss adjusters** as may be necessary to file any relevant claims and benefits.
* **Consultants and advisors** who assist us with legal, regulatory, and business operations activities, such as legal counsel, compliance consultants and business auditors.
* **Governmental Regulators** as necessaryto comply with Telford’s legal obligations in certain countries.
* **Business partners in case of a merger or sale**, such as if Telford or its parent company or corporate group is/are merged with another organization, or in the event of a transfer of our assets or operations.

### Legally Compelled Disclosure

We may be required to disclose your personal information to governmental and regulatory authorities, law enforcement agencies, courts and/or litigants when legally compelled to do so, for example, in response to a court order, subpoena or other lawful, legally-binding request, including to meet national security or law enforcement agencies requirements, or in connection with legal proceedings or similar processes as necessary to exercise or defend our legal rights.

CBRE is committed to not disclose your personal information in response to an international court order or a subpoena or other legal obligation, unless we are legally compelled to do so under applicable law. In particular, CBRE, Inc. has assessed and is of the view that neither it nor its US subsidiaries qualify as a provider of electronic communication service, as defined in 18 U.S.C. § 2510, nor a provider of a remote computing service, as defined in 18 U.S.C. § 2711, and thus US public authorities cannot issue a legally binding demand for disclosure of data under Section 702 of the US Foreign Intelligence Surveillance Act ("**FISA 702**") upon CBRE, Inc. or its US subsidiaries. In case CBRE nevertheless receives at some point a disclosure demand for personal information under FISA 702, we will publish a Transparency Report on cbre.com and our EEA websites (see our Schrems II statement). All personal data transferred by CBRE to the US is encrypted in transit.

## Retention of Personal Information

We will retain your personal information only for as long as required to satisfy the purpose for which such information was collected, unless otherwise required by law or regulation to be retained for a longer period. Information related to your reservation and/or purchase of the Property is retained for twelve (12) years. Should you require further information as to the retention period, please do not hesitate to contact us.

## How We Secure Personal Information

We implement appropriate technical and organizational security measures to safeguard the personal information we collect and process about you against loss and unauthorized alteration or disclosure. The information you provide is encrypted in transit and at rest. We utilize role-based access controls to limit access to your personal information on a strict need-to-know basis consistent with the purposes for which we have collected such information. We utilize anti-malware and intrusion detection systems to guard against unauthorized access to our network, and we have an incident response plan in place to quickly respond to any suspected leak or breach of personal information.

Where we share your personal information with our service providers, we have assessed that their technical and organizational measures provide an appropriate level of security.

## International Data Transfers

Your personal information may be processed and hosted in countries other than your home country, such as the United States. Those other countries may have less stringent data protection laws than the country in which you reside, in which you initially provided the information and/or in which your information was originally collected.

In case of international data transfers, we will protect your personal information as required by all applicable data protection laws.

### EEA and UK to Non-EEA Data Transfers

With respect to international data transfers initiated by Telford from the UK to recipients in any non-EEA jurisdictions,

* some recipients are located in countries which are considered as providing for an adequate level of data protection under EU law (or UK law, as applicable). These transfers do not, therefore, require any additional safeguards under EU (or UK, as applicable) data protection law.
* other recipients are located in countries not providing an adequate level of data protection under EU or UK law, such as the United Stated and, where required by law, we have implemented appropriate safeguards, such as EU Standard Contractual Clauses, and/or are relying on binding corporate rules of the recipient or an appropriate derogation. Where applicable, we implement supplementary technical and contractual safeguards. Under applicable law you may have the right to ask for further information on such appropriate safeguards (see [Section 9 - Contact CBRE](#_Contact_CBRE) below).

As stated above (see [Legally Compelled Disclosures](#_Legally_Compelled_Disclosure)), CBRE has assessed and is of the view that US public authorities cannot issue a lawful disclosure demand for personal data under FISA 702 upon CBRE, Inc. or its US subsidiaries. All personal data transferred by CBRE to the US is encrypted in transit.

## Your Data Privacy Rights

Depending on the legal regulations in your country and the applicable laws to which you are subject, you may have all or some of the following rights set out below and may submit a request(s) to exercise any such rights through our [Data Subject Rights Portal](https://dsr.cbre.com) or by contacting us at [dsr@cbre.com](mailto:dsr@cbre.com). Irrespective of the CBRE entity that is responsible for the processing of your personal information, you may use such centralized contact details and CBRE will ensure that the responsible CBRE entity receives your request and addresses it promptly as required by applicable law. CBRE will respond to your request comprehensively, even if you do not identify the particular CBRE entity against whom you make the request.

* **Right of access**: You may have the right to obtain from CBRE confirmation as to whether your personal information is being processed, and, where that is the case, to request access to your personal information. You may have the right to obtain a copy of your personal information undergoing processing. For additional copies requested by you, CBRE may charge a reasonable fee based on administrative costs.
* **Right to rectification:** You may have the right to obtain from CBRE the rectification of inaccurate personal information concerning you.
* **Right to erasure (right to be forgotten) or anonymization:** You may have the right to ask us to erase (or in some jurisdictions, anonymize) your personal information. In some jurisdictions, this right may be limited to deletion or anonymization of data that is unnecessary, excessive, or unlawfully processed, or deletion of data that is processed based on your consent.
* **Right to restriction of processing:** You may have the right to request the restriction of processing your personal information.
* **Right to data portability:** You may have the right to receive your personal information which you have provided to CBRE in a structured, commonly used and machine-readable format and you may have the right to transmit those personal information to another entity without hindrance.
* **Right to withdraw consent:** If we rely on your consent for any personal information processing activities, you have the right to withdraw or revoke this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. This right to withdraw consent applies in particular to consents given for marketing and profiling purposes, if any.
* **Right to object:** Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal information by CBRE, and CBRE can be required to no longer process your personal information unless CBRE demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. The right to object may, in particular, not exist if the processing of your personal information is necessary to take steps prior to entering into a contract or to perform a contract already concluded.
* **Right to request an explanation of our processing activity of your personal information**
* **Right to information on the possibility to withhold consent** and information on the consequences of doing so**.**
* **Right to information on** third **parties with whom we have shared your data.**
* **Right to lodge a** complaint **with the competent data protection authority** in your home country or in the country in which the responsible CBRE entity is located, in particular with respect to the result of automated decision-making. A list of European Union Data Protection Authorities is [available](https://edpb.europa.eu/about-edpb/board/members_en) from the European Data Protection Board. In Brazil, the competent data protection authority is the Autoridade Nacional de Proteção de Dados (ANPD).

## Contact Telford or CBRE

You are always free to contact us if you have questions or concerns regarding this Notice or our data handling practices. We may contact you by email in relation to any Observations, Incidents, and Self-Certifications you report or make. If you prefer us to contact you in an alternative manner, please let us know and we will accommodate your request if possible and appropriate.

### General Enquiries

You may contact CBRE’s Global Data Privacy Office (“**GDPO**”) at [Privacy.Office@cbre.com](mailto:Privacy.Office@cbre.com) or by writing to us at 321 North Clark Street, Suite 3400, Chicago, Illinois 60654, Attention: Global Director, Data Privacy. You may also raise questions or concerns about the GDPO to CBRE’s Ethics & Compliance department via the [CBRE Ethics Helpline](http://secure.ethicspoint.com/domain/media/en/gui/7298/index.html).

#### Individuals in Europe, the Middle East or Africa:

If you are located in Europe, the Middle East or Africa, you may also e-mail us via the GDPO at [EMEAPrivacyDirector@cbre.com](mailto:EMEAPrivacyDirector@cbre.com) or write to us at St. Martins Court, 10 Paternoster Row, London EC4M 7HP, United Kingdom, Attention: EMEA Director, Data Privacy.

### Data Protection Officers

In some countries, Telford’s corporate group has appointed a Data Protection Officer (“**DPO**”), whom you may contact with questions or concerns about how Telford processes your personal information. Contact information for our DPOs in the European Union, the UK and Brazil is available in the group’s [Global Privacy and Cookie Notice](https://www.cbre.com/about/privacy-policy).

## Changes to this Notice

We are a rapidly evolving, global business. We will continue to assess and make changes to this Notice from time to time as required. If we make any material changes to this Notice, we will make changes here and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Notice changes). Where required, we will obtain your consent.

# Appendix 1

In the table below, the data controller for your personal information has been identified, depending on various factors of the processing activity.

|  | **Processing Activity** | **Data Controller** |
| --- | --- | --- |
| A. | Administering your reservation and/or purchase of the Property | Telford Homes Ltd. |