

PRIVACY POLICY

Date Revised	4 August 2020
Document Reference	LGL/032
Responsible Party	Legal & Compliance
Document Classification	Public

Section 1 - Key Information

Who we are:

We are a passionate team of people with a wealth of experience in creating high quality homes in the UK. All references in this policy to "Lifestory", "the Lifestory Group", "our", "us" or "we" refer to Lifestory Group Limited (08221003) and Anthology Group Limited (09678933) and their subsidiaries.

All references in this policy to "our website" refer to our website at www.lifestory.group

Our values and what this policy is for:

We value your privacy and want to be accountable and fair as well as transparent in the way that we collect and use your personal information. We also want you to know your rights in relation to your information.

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this privacy policy please email dataprotection@lifestory.group

Who this policy applies to:

This policy applies to:

1. Visitors to our websites;
2. Customers (including our homeowners and their visitors);
3. Prospective customers (who we send marketing communications to);
4. People who contact us with enquiries; and
5. Our suppliers and employees of our suppliers.

Depending on our relationship, we will collect and use your information in different ways.

What this policy contains:

This privacy policy describes the following important topics relating to your information

1. How we obtain your personal information;
2. Collection of your personal information and how we use it;
3. Our legal basis for using your personal information;
4. How and why we share your personal information;
5. How long we store your personal information;

6. Your rights;
7. Marketing;
8. Where we may transfer your personal information;
9. Risks and how we keep your personal information secure;
10. Links to other websites;
11. Changes to this privacy policy; and
12. Further questions and how to make a complaint

Your rights to object:

You have various rights in respect of our use of your personal information. Two of the fundamental rights to be aware of are that you may:

1. ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
2. ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

What you need to do and your confirmation to us:

Please read this privacy policy carefully to understand how we handle your personal information. By engaging with us in the ways set out in this privacy policy, you confirm that you have read and understood the entirety of this privacy policy, as it applies to you.

Section 2 - Key Information

How we obtain your personal information:

You may provide us with your personal information voluntarily. However, we may also receive information about you from third parties such as marketing agencies, market research companies, our suppliers, contractors and consultants at our sites, group companies, public websites and public agencies, which we refer to as "third party sources" or "suppliers" throughout this policy.

If you are an owner you may wish to know that our suppliers include Tunstall Healthcare (UK) Limited ("Tunstall") who provides out of hours emergency support, National Property Assistance Limited ("NPA") who provide us with emergency property support, Rendall & Rittner who provide our estates management function, Aprico Limited for removal services, maintenance contractors to ensure our obligations as a landlord and utility companies to provide you with the services offered. Helicon Management Limited ("Helicon"), Lifestory Customer Operations Limited and Lifestory Agency Services Limited, who deliver our customer services and are

not a third party as they are a part of the Lifestory Group.

You may give us personal information about yourself by using the online forms provided on our website, completing forms for or at our properties or for our other later living and associated services, setting up an account with us, signing-in at one of our properties, applying for vacancies within our Group, or by contacting us by phone, email or other means. This includes, for example, where you provide your personal information to us in order to receive information or services from us. If you are a supplier, you may also give us personal information about you when you are offering or providing services to us.

Collection of your personal information and how we use it:

Please go to the section or sections below that best describes our relationship with you to find out the information that we collect about you and how we use this information. We refer to this as "personal information" throughout this policy.

Section 3 - Visitors to our websites

What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

1. your name;
2. your postal address;
3. your email address;
4. your telephone number;
5. health & wellbeing information;
6. information provided when you correspond with us;
7. any updates to information provided to us;
8. personal information we collect about you or that we obtain from our third party sources;
9. the following information created and recorded automatically when you visit our website:
 - (a) Technical information - this includes: the internet protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website, to measure the efficiency of our systems and to undertake an analysis on the locations from which people access our web pages;
 - (b) Information about your visit and your behaviour on our website (for example, the pages that you click on). This may include the website you visit before and after visiting our website (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), the methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads

How we use your personal information:

We will collect, use and store the personal information listed above for the following reasons:

1. to allow you to access and use our website;
2. to receive enquiries from you through the website about our retirement living services including our properties;
3. for improvement and maintenance of our website and to provide technical support for our website;
4. to ensure the security of our website;
5. to recognise you when you return to our website, to store information about your preferences, and to allow us to customise the website according to your individual interests; and

6. to evaluate your visit to the website and prepare reports or compile statistics to understand the type of people who use our website, how they use our website and to make our website more intuitive. Such details will be anonymised as far as reasonably possible and you will not be identifiable from the information collected.

A word about cookies

- a. Some pages on our website use cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.
- b. Where we use cookies on our website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website or to use all the functionality provided through our website.
- c. For detailed information on the cookies we use and the purposes for which we use them, please refer to our cookies policy or by contacting the Legal & Compliance team.

Section 4 - Customers (including our homeowners)

What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

1. your name;
2. postal address;
3. email address;
4. telephone number;
5. age;
6. date of birth;
7. gender;
8. emergency contact information;
9. marital status;
10. next of kin details;
11. third party contact details for example your GP/doctor in case of an emergency;
12. spouse or civil partner name;
13. pets;
14. previous house details inc value, type, size;
15. car registration number;
16. information provided when you correspond with us;
17. any updates to information provided to us;
18. information about the utilities you use;
19. information about the retirement living and associated services we provide to you;
20. information needed to provide the services to you (including information on joining forms, order details, order history and payment details);
21. customer services information;
22. customer relationship management and marketing information;
23. information about your health and wellbeing;
24. health and safety information, including any accidents you have at one of our properties;
25. CCTV recordings;
26. voice recordings;
27. information you provide to help us provide you with improved retirement living and associated services, for example if we ask you to fill in a survey or questionnaire;
28. details of your character and physical description;

29. details of your leisure activities and interests;
30. information about your preferences;
31. health information to enable us to support you and others within the development;
32. information about your occupation of the premises for security purposes; *and*
33. financial information for payment of rent, service charges and services available at each site.

How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

1. to provide you with associated services including our properties;
2. to deal with any enquiries or issues you have about our developments and associated services that you request from us including our properties;
3. to provide support for any faults in our technology or other amenities you may use at our properties;
4. to provide support for any faults or maintenance required within the building or apartment;
5. to send you communications (including by email or post) about our developments and associated services such as service announcements and administrative messages (for example, setting out changes to our terms and conditions and keeping you informed about our fees and charges);
6. to ensure your safety and security and that of others, including the use of CCTV;
7. quality assurance of our properties and associated services;
8. to carry out statistical analysis and market research on people who may be interested in our developments and associated services;
9. to contact your next of kin, health care provider and emergency services in case of an emergency; and
10. if you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by email or post) with information about our developments and associated services which either you request, or which we feel will be of interest to you (including newsletters).

Source of personal information

We may receive some of your personal information from third parties, such as your family members, carers, medical professionals, estate agents, legal providers, property maintenance or from Rendall & Rittner, Tunstall or NPA where you use our out of hours emergency support service. We may also receive information about you from the emergency services if you have an emergency when at one of our developments.

We may receive some of your personal information from third parties, such as marketing agencies or Experian who provide us with your name and address in order to send you marketing information through the post which we can provide upon request.

Special categories of data

Some of the personal information that we collect about you or which you provide to us about you or your family members may be special categories of data. Special categories of data include information about physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical beliefs, trade union membership and biometric data.

Information we need to provide services to you

We need certain types of personal information so that we can provide services to you and perform contractual and other legal obligations that we have to you, including ensuring your wellbeing when at our properties. If you do not provide us with such personal information, or if you ask us to delete it, you may no longer be able to access our retirement living and associated services.

Our use of your family and next of kin information

Separately, we may process personal information about your family and next of kin so that we may contact them in an emergency. We will only process your or your family/next of kin's personal information for this specific purpose or for any other purposes specifically permitted by law.

Section 5 - Prospective customers who we send marketing communications to

What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

1. your name;
2. age;
3. date of birth;
4. your postal address;
5. your email address;
6. your telephone number;
7. property details including financial information; *and*
8. information about your preferences

How we use your personal information

We will collect, use and store the personal information listed above, if you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by email or post) with information about our products and services which either you request, or which we feel will be of interest to you (including newsletters, invitations).

Source of personal information

We may receive some of your personal information from third parties, such as marketing agencies or Experian.

Section 6 - People who contact us with enquiries

What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

1. your name;
2. postal address;
3. email address;
4. telephone number;
5. age;
6. date of birth
7. marital status;
8. occupation;
9. voice recordings;
10. health & wellbeing information;
11. information provided when you correspond with us;
12. any updates to information provided to us; *and*
13. current property value

How we use your personal information

We will collect, use and store the personal information listed above to deal with any enquiries or issues you have about our retirement living and associated services or our business, building sites and developments, including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes.

Section 7 - Suppliers

What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

1. your name;
2. work contact information (phone number, postal address, mailing address, email address);
3. job title;
4. gender;
5. date of birth;
6. emergency contact information;
7. information provided when you correspond with us;
8. any updates to information provided to us;
9. personal information we collect about you from third party sources such as LinkedIn;
10. workplace accident information and medical or health information (relevant to your work for us);
11. emergency contact information;
12. CVs, pitch and tender information;
13. proof of identification and address;
14. visa or work permit documentation;
15. details of compensation, expense claims and bank details;
16. information required to access company systems and applications (such as system ID);
17. work hours (overtime and hours worked);
18. if you attend our sites, CCTV recordings; *and*
19. criminal records checks (where applicable and allowed by law)

How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

1. to enable us to receive and manage services from you (including supplier due diligence, payment and expense reporting and financial audits);
2. to assess your working capacity;
3. to confirm information on CVs and performance reference checks, to assess you or your employer's suitability to work for us;
4. for equal opportunities monitoring;
5. for health and safety records and management;

6. to contact your next of kin in an emergency;
7. for security vetting and criminal records checks (where applicable and allowed by law); *and*
8. for CCTV monitoring and other security of company facilities.

Source of personal information

We may receive some of your personal information from third party sources, such as your employer or your employer's company website. We may also collect this personal information from publicly-available sources, such as LinkedIn, Facebook or Twitter.

Special categories of data

Some of the personal information that we collect about you or which you provide to us about you or your employees may be special categories of data. Special categories of data includes information about your physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical beliefs, trade union membership and biometric data.

Information we need to provide services to you

Please note that we need certain types of personal information so that you or your employer can provide services to us. If you do not provide us with such personal information, or if you or your employer ask us to delete it, you may no longer be able to provide services to us.

Use of your family and next of kin information

Separately, we may process personal information about your family and next of kin so that we may contact them in an emergency. We will only process your or your family/next of kin's personal information for this specific purpose or for any other purposes specifically permitted by law.

Section 8 - Our relationship with you

Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:

1. to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
2. for internal corporate reporting, business administration, statistical analysis, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;
3. to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and
4. to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

Section 9 - Further processing

Legal basis for use of your personal information

We consider that the legal basis for using your personal information as set out in this privacy policy is as follows:

1. our use of your personal information is necessary to perform our obligations under any contract with you (for example, to sell you a retirement property and provide retirement living and associated services to you, to fulfil an order you have placed with us, to comply with the terms of use of our website which you accept by browsing our website and/or to comply with our contract to provide services to or receive services from you or your employer); or
2. our use of your personal information is necessary for complying with our legal obligations (for example, for health and safety purposes); or
3. where neither (1) nor (2) apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website).

Our legitimate interests are to:

1. run, grow and develop our business;
2. operate our websites;
3. select appropriately skilled and qualified suppliers;
4. ensure that we can train our staff;
5. ensure a safe environment for our owners and suppliers;
6. marketing, market research and business development;
7. to provide our customers and owners, make and receive payment and provide customer services;
8. administer the lease we put in place with our owners to ensure that we comply with our obligations under the lease and to ensure that we can exercise our rights under the lease;
9. ensure that we comply with all statutory and other legal obligations placed upon us including our companies operating under the Renaissance and Pegasus brands and suppliers which provide services to us;
10. place, track and ensure fulfilment of orders with our suppliers; *and*
11. for internal group administrative purposes.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information.

We may use your special categories of data (such as health and wellbeing information) where you have provided your consent (which you may withdraw at any time after giving it, as described below).

We may process your personal information in some cases for marketing purposes on the basis of your consent (which you may withdraw at any time after giving it, as described below).

If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at dataprotection@lifestory.group and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to be able to provide any associated services to you (for example, if those services require use of your special categories of data such as health information).

Please contact us by email at dataprotection@lifestory.group if you want further information on the analysis we will undertake to establish if a new use of your personal information is compatible with these purposes.

How and why we share your personal information with others

We may share your personal information with the Lifestory Group companies where it is in our legitimate interests to do so for internal administrative purposes (for example, ensuring consistent and coherent delivery of retirement living and associated services to our customers, corporate strategy, compliance, auditing and monitoring, research and development and quality assurance).

We will share your personal information with the following third parties or categories of third parties:

1. Tunstall who provide you with our out of hours emergency support service. Tunstall will also share your personal information with us;
2. NPA who provide emergency support for our owners. NPA will also share personal information with us;
3. Rendall & Rittner who provide the group with our estates management function;
4. our other service providers and subcontractors, including but not limited to payment processors, utility providers, suppliers of technical and support services, insurers, logistic providers, and cloud service providers;
5. public agencies and the emergency services;
6. companies that assist us in our marketing, advertising and promotional activities;
7. companies that provide our public relations service;
8. analytics and search engine providers that assist us in the improvement and optimisation of our website;
9. Aprico Limited who assist on moving from your home into one of our properties as part of the Lifestory Group service;

10. a handyman service available upon request as part of the Lifestory Group's service for new owners; and
11. any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for any purpose other than to provide services for us.

We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

We will also disclose your personal information to third parties

1. where it is in our legitimate interests to do so to run, grow and develop our business;
2. if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
3. if substantially all of Lifestory Group or any of its affiliates' assets are acquired by a third party, in which case personal information held by us will be one of the transferred assets;
4. if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
5. in order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
6. to protect the rights, property, or safety of the Lifestory Group, our staff, our customers (including owners) or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction; and
7. We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our goods and services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

How long we store your personal information

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

Your rights

You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at dataprotection@lifestory.group.

You have the following rights:

<i>Right of access</i>	You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area ("EEA").
<i>Right to update your information.</i>	You have a right to request an update to any of your personal information which is out of date or incorrect.
<i>Right delete your information</i>	You have a right to ask us to delete any personal information which we hold about you in certain specific circumstances. We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort.
<i>Right to restrict the use of your information</i>	You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort.
<i>Right to stop marketing</i>	You have a right to ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
<i>Right to data portability</i>	You have a right to ask us to provide your personal information to a third party provider of services.

	<p>This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.</p>
<p>Right to object</p>	<p>You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.</p> <p>We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.</p> <p>If an exception applies, we will tell you this when responding to your request. We may request you to provide us with information necessary to confirm your identity before responding to any request you make.</p>

Marketing

We may collect and use your personal information for undertaking marketing by email, telephone and post.

We may send you certain marketing communications (including electronic marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes.

However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.

If you wish to stop receiving marketing communications, you can contact us by email at dataprotection@lifestory.group

Where we may transfer your personal information

Your personal information may be used, stored and/or accessed by staff operating outside the EEA working for us, other members of our group or suppliers.

If we provide any personal information about you to any such non-EEA members of our group or suppliers, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this privacy policy. These measures may include the following permitted in Articles 45 and 46 of the General Data Protection Regulations:

1. in the case of US based entities, entering into European Commission approved standard contractual arrangements with them; or
2. in the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.

Further details on the steps we take to protect your personal information, in these cases are available from us on request by contacting us by email at dataprotection@lifestory.group at any time.

Risks and how we keep your personal information secure

The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private.

For this reason, the Lifestory Group is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information through the use of appropriate organisational and technical measures including but not exclusive of staff training, lockable storage, shredding facilities, encrypted laptops and PCs, all G-suite accounts have extra security in the form of two-step authentication and all PC's & laptops have anti-virus software.

In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

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

Links to other websites

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators.

This privacy policy only applies to the personal information that we collect or which we receive from third party sources, and we cannot be responsible for personal information about you that is collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites.

We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

Changes to our privacy policy

We may update our privacy policy from time to time. Please check back frequently to see any updates or changes to our privacy policy.

Section 10 - Further questions & how to make a complaint

If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact us at dataprotection@lifestory.group. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

In accordance with Article 77 of the General Data Protection Regulations, you may also make a complaint to the Information Commissioner's Office (ICO), or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.