

RSK/SCP Privacy Policy

1. Your privacy is important to us

This privacy policy sets out how we collect and process your personal data when you visit our website and when you interact with us through any other ways, such as enquiring about and/or contracting with us for any of our services, subscribing to our publications or attending any of our events. It also tells you about your privacy rights and how the law protects you.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Our website(s) and services are not intended for children and we do not knowingly collect data relating to children.

2. Who we are

We are **SCP Transport**, a subsidiary of **RSK Group Limited** a company incorporated in England, UK with registered number 03761340 and having its registered office at Spring Lodge, 172 Chester Road, Helsby WA60AR. We are subcontracted to Vistry Group PLC to deliver this website on their behalf. If you have privacy questions which are not answered by this Privacy Policy or any other concerns about how we use your personal information, you can contact us at privacy@rsk.co.uk.

We are **Vistry Group PLC**, a public limited company incorporated in England and Wales (company number 0397634 - Vistry Homes Limited) with our registered office at 11 Tower View, Kings Hill, West Malling, Kent, ME19 4UY ('**Vistry**').

The Vistry Group is made up of different legal entities that we do business through, details of which can be found at this link (each a '**Group Entity**' or together, '**Group Entities**'). The trading styles that we use are:

- Bovis Homes
- Linden Homes
- Vistry Partnerships

This privacy policy is issued on behalf of the Vistry Group so when we mention "Vistry", "we", "us" or "our" in the privacy policy, we are referring to the relevant entity in the Vistry Group responsible for processing your data.

From time to time we will establish separate legal entities for our developments with a third party, those entities own the properties on a development. Where we establish a separate "**legal entity**" with a third party for a development, that entity, us and the third party will be joint controllers of any personal data collected in connection with the sale and marketing of those properties. You can find a list of the separate legal entities that we have established via a link within our General Privacy Policy [here](#).

Data is collected, processed and stored by us and we are known as the data controller of the information that you provide to us. We handle and store your information in line with UK data protection laws.

Our contact details for any questions about this privacy policy can be found at the end of this privacy policy.

3. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

4. Third-party links in our website

Our website may include links to third-party websites (which include other RSK Group company websites), plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

5. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data includes your username and password, service engagements made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties (including other companies in the RSK Group) and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

6. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we

may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

7. How is your personal data collected?

We use different methods to collect data from and about you including:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Enquire about and contract with us for our services;
 - request marketing to be sent to you; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- From third parties or publicly available sources such as:
 - Other companies in the RSK Group;
 - Service providers who provide IT and system administration services;
 - Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
 - HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

8. How we use your personal data

We may only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

9. Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the

specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To perform and deliver a service to you including (a)managing and processing green travel vouchers	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you)
To manage our relationship with you which will include (a)notifying you about changes to our terms or privacy policy (b)asking you for feedback or to taking a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

10. Marketig

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services, may be relevant for you.

You will receive marketing communications from us if you have requested information from us, purchased services from us and you have not opted out of receiving that marketing.

We do not share your personal data with any external third party for marketing purposes.

11. Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service provision.

12. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please review our cookie policy.

13. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

14. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above:

- Other companies in the RSK Group;
- **LiveWest Homes Limited**, a charitable community benefit society. Registered Office: 1 Wellington Way, Skypark, Clyst Honiton, Exeter, EX5 2FZ. Registered in England and Wales No 7724. Data will be shared with LiveWest in order to validate their residents' details.
- **Stagecoach South West**, a trading name of Stagecoach Devon Limited. Registered Office: One Stockport Exchange, 20 Railway Road, Stockport, United Kingdom, SK1 3SW Registered in England and Wales No. 3142135. Data will be shared with Stagecoach to process any Bus Voucher claims.
- **Partridge Cycles Ltd**, A38 Kennford, Exeter, Devon. EX6 7TW. Registered Office: Sigma House Oak View Close, Edginswell Park, Torquay, Devon, United Kingdom, TQ2 7FF. Registered in England and Wales No. 07583666. Data will be shared with Partridge Cycles to process any Bike Voucher claims.
- Service providers acting as processors who provide IT, finance, marketing and system administration services.
- Professional advisers to our business including lawyers, bankers, auditors and insurers. HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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.

15. International transfers

If we transfer your personal data out of the European Economic Area (EEA), we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission
- Where we use certain service providers, we may use Standard Contractual Clauses (SCCs) approved by the European Commission or the ICO UK Addendum which give personal data the same protection it has in the EEA.

16. 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.

17. Data retention. How long will you use my personal data for?

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. 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.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being clients for tax purposes.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

18. Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data (commonly known as a data subject access request). This enables you to receive a copy of your personal data we hold about you and to check that we are lawfully processing it.
- Request correction of your personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- Request erasure of your personal data this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request restriction of processing your personal data This enables you to ask us to suspend the processing of personal data about you, for example, if you want us to establish its accuracy or the reason for processing it.
- Request transfer of your personal data to another party (in limited circumstances).
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please use the contact details set out at the end of this privacy policy.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

19. Contact details

If you have any questions about this privacy policy or our privacy practices, please write to the Data Protection Officer at info@scptransport.co.uk. SCP Transport, Colwyn Chambers, 19 York Street, Manchester, M2 3BA. Registered address: Spring Lodge, 172 Chester Road, Helsby, Cheshire, WA6 0AR/65 Sussex Street, Glasgow, G41 1DX.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues www.ico.org.uk. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

20. Privacy policy update

We keep this policy under regular review and reserve the right to change it at any time without notice. Updated versions will be published on our website.