



# PRIVACY POLICY

## INFORMATION SHEET

Welcome to the Retirement Security Limited ("RSL") privacy policy.

RSL respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

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## 1. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this privacy policy

This privacy policy gives you information on how RSL collects and uses your personal data including any data you may provide through our website, when you purchase a product or service or become a resident of one of our Courts.

We do not knowingly collect data relating to children.

### Controller

Retirement Security Limited is the controller and responsible for your personal data (collectively referred to as "RSL", "we", "us" or "our" in this privacy policy).

We have appointed a privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager. email: [info@retirementsecurity.co.uk](mailto:info@retirementsecurity.co.uk) tel: 01789 292952

## 2. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

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, last name, and previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **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, device ID, and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact and use our website and use our products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data which is not considered personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with us to help improve our website, or our products or services.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

#### Direct interactions

You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- become an Owner at one of our Courts;
- when you become a shareholder in the company or a shareholder in the company that manages the Court in which you own a property (whether as a legal owner, trustee, or beneficiary);
- apply for our products or services;
- subscribe to our services or publications;
- request marketing information to be sent to you;
- create an account on our website; 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.

#### Third parties or publicly available sources.

We will receive personal data about you from various third parties and public sources as set out below:

#### Technical Data from the following parties:

- Analytics providers such as Google based outside the UK;
- Advertising networks based inside and outside the UK; and
- Search information providers such as Google based inside or outside the UK.
- Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services based both inside and outside the UK.
- Identity and Contact Data is collected from data brokers or aggregators based inside and outside the UK.
- Identity and Contact Data is collected from publicly available sources such as Companies House and the Electoral Register based inside the UK.

### 4. HOW WE USE YOUR PERSONAL DATA

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

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential

impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis. For example, where you are shareholder in RSL or one of the Courts in which you own a property, your personal data will need to be included in the statutory register of company members as a matter of law.

- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis and retention period
To register you as a new Owner at one of our Courts	(a) Identity (b) Contact	Performance of a contract with you Retention Period: whilst you are an Owner and for a period of up to six years thereafter.
To register you as a shareholder in RSL or in one of our managed Courts.	(a) Identity (b) Contact	Necessary to comply with a legal obligation. Retention Period: The register of members must be kept at all times. When you sell or otherwise dispose of your apartment and transfer your share to a new Owner, we will remove you from the register of members although a historical trace will remain, both within our statutory books, and with the entries made and retained at Companies House.

Purpose/Use	Type of data	Legal basis and retention period
<p>To process and deliver your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p> <p>Retention Period: whilst you are an Owner and for a period of up to six years thereafter.</p>
<p>To manage our relationship with you which will include notifying you about changes to our terms or privacy policy or dealing with your requests, complaints and queries.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/ services)</p> <p>Retention Period: whilst you are an Owner and for a period of up to six years thereafter.</p>
<p>To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(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)</p> <p>(b) Necessary to comply with a legal obligation</p> <p>Retention Period: whilst you are an Owner</p>

Purpose/Use	Type of data	Legal basis and retention period
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) Retention Period: 6 months
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) Retention period: 6 months
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business) Retention Period: 6 years from your last interaction with us.
To carry our market research	a) Identity (b) Contact (c) Usage (d) Profile (e) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business) Retention Period: 6 years from your last interaction with us.

## Direct marketing

During any enquiry on our website when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from us via email, text message, telephone, post, or other means of communication.

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

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

## Third-party marketing

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

## Opting out of marketing

You can ask us to stop sending you marketing communications at any time by sending an email to [resales@retirementsecurity.co.uk](mailto:resales@retirementsecurity.co.uk) or by following the opt-out links within any marketing communication sent to you, or 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 us providing property management services to the Court in which you reside.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data where necessary with the parties set out below for the purposes set out in the table on page 4.

### Internal Third Parties

Other companies in our Group, including the companies which own or manage each of the Courts in our group and who are based in the UK.

### External Third Parties

- Service providers acting as processors based both in the UK and abroad from time to time who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK 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.

## 6. INTERNATIONAL TRANSFERS

We may share your personal data where necessary with the parties set out below for the purposes set out in the table on page 4.

### Internal Third Parties

Whenever we transfer your personal data out of the UK, we will carry out a risk assessment to 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.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.
- We use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement.

- We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 7. 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.



## 8. DATA RETENTION

### How long will you use my personal data for?

Details of retention periods for certain aspects of your personal data are set out in the table above.

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 customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

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.

## 9. YOUR LEGAL RIGHTS

You have a number of rights under data protection laws in relation to your personal data.

If you wish to exercise any of your rights, please contact the Data Privacy Manager.

You have the right to:

**Request access** to your personal data (commonly known as a “subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data in certain circumstances. 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 also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling

based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

You also have the right to object at any time to the processing of your personal data for direct marketing purposes (see OPT OUT OF MARKETING above).

#### **Request restriction of processing**

of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

#### **No fee usually required**

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.

#### **What we may need from you**




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.

#### **Time limit to respond**

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.

## 10. CONTACT DETAILS

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

-  Email address:  
info@retirementsecurity.co.uk
-  Postal address:  
Unit 3, Wellesbourne Distribution Park,  
Loxley Road, Warwick CV35 9JY
-  Telephone number:  
01789 292952

## 11. COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://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.

## 12. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated in January 2025.

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, for example a new address or email address.

## 13. THIRD-PARTY LINKS

Our website may include links to third-party 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.