

HARWORTH GROUP PLC PRIVACY NOTICE

Harworth Group Plc and its affiliates (collectively referred to as "Harworth", "we", "us" and "our") takes its data protection and privacy responsibilities seriously. This privacy notice explains how we collect, use and share personal information in the course of our business activities, including:

- [What personal information we collect and when and why we use it.](#)
- [How we share personal information within Harworth and with our service providers, regulators and other third parties](#)
- [Explaining more about Direct Marketing](#)
- [Transferring personal information globally](#)
- [How we protect and store personal information](#)
- [Legal rights available to help manage your privacy](#)
- [How you can contact us for more support](#)

Important information about Harworth:

The Harworth entity responsible for your personal information will be the member of Harworth that originally collects information from or about you. This will be explained in separate privacy notices made available when your personal information is first collected by that Harworth entity, for example where we engage you as a contractor to carry out works for us.

You can find out more about Harworth at www.harworthgroup.com or by contacting us using the information in the [contact us](#) section.

We may amend this notice from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check these pages for the latest version of this notice. If we make significant changes to this privacy notice, we will make this clear on our website.

You might find external links to third party websites on our website. This privacy notice does not apply to your use of a third party site.

WHAT PERSONAL INFORMATION WE COLLECT AND WHEN AND WHY WE USE IT

In this section you can find out more about

- the types of personal information we collect
- when we collect personal information
- how we use personal information
- the legal basis for using personal information

When we collect information

We collect information about you if:

- you use one of our website(s)
- you buy or rent a house on one of our development sites
- we engage you as a professional adviser, such as a selling or letting agent
- we engage you as a contractor or consultant to carry out certain works for us
- you buy shares in Harworth Group plc
- you buy or lease land or a commercial unit at one of our development sites
- you are an insurance claimant in relation to one of our sites or your previous employment by Harworth or, more likely, one of the former UK Coal companies
- sell land to us or enter into a planning promotion agreement with us
- you ask us to give you updates on the progress we are making on development at a particular site

collectively ("you")

Personal information we collect and use if you use our websites or online services

On our website, information that may constitute personal information (such as your browser type, operating system, IP address, domain name, number of times you visited the website, dates you visited

the website, and the amount of time you spent viewing the website) may be collected via cookies. Aggregate information (such as how many times visitors log onto the website) may also be collected.

Personal information we collect and use if you buy or rent a house on one of our development sites

Where you buy or rent a house on one of our development sites, we may collect:

- basic identification and contact information (such as your name, address, telephone number, and email address) so that our management company can fulfil its obligations to maintain the public open spaces at the development site;
- financial information (such as bank account information, billing and details) in order to manage and process service charge payments you make to us;
- information about your house, such as its type, size and cost (albeit we collect the latter from publicly available information at the Land Registry) and the housebuilder who sold it to you, to inform the decisions we make about public open space and our planning obligations at the site you occupy.

Personal information we collect and use if we engage you as a professional adviser

Where we engage you as a professional adviser, we may collect:

- basic identification and contact information (such as your name, work address, telephone number, and email address) so that we can communicate with you during the course of your engagement by us;
- financial information (such as the bank account information, tax registration information and billing details for your business) so that we can make payment to you for your services;
- certain other information about your business, such as the number of people you employ, your insurance details, details of the policies and procedures you have in place, statistics relating to health and safety and the environmental incidents that have occurred in the course of you operating your business, details of any enforcement action taken against you, and confirmation of your compliance with certain laws, all to enable us to assess your suitability to provide services to us.

Personal information we collect and use if we engage you as a contractor or consultant

Where we engage you as a contractor or consultant to carry out certain works for us, we may collect:

- basic identification and contact information (such as your name, work address, telephone number, and email address) so that we can communicate with you during the course of your engagement by us;
- financial information (such as the bank account information, tax registration information and billing details for your business) so that we can make payment to you for the works you undertake; and
- certain other information about your business, such as the number of people you employ, your insurance details, details of the policies and procedures you have in place, statistics relating to health and safety and the environmental incidents that have occurred in the course of you operating your business, details of any enforcement action taken against you, and confirmation of your compliance with certain laws, all to enable us to assess your suitability to carry out the works for us.

Personal information we collect and use if you buy shares in Harworth Group plc

When you buy shares in Harworth Group plc your details will be added to our shareholders' register. This means that we may collect:

- basic identification and contact information (such as your name, address, telephone number, and email address) and details of the number of shares you hold so that we can include you in communications to all of our shareholders;
- financial information (such as bank account information) so that we can pay dividends to you.

Personal information we collect and use if you buy or lease one of the commercial units at one of our development sites

Where you buy or lease land or a commercial unit at one of our development sites, we may collect:

- basic identification and contact information (such as your name, work address, telephone number, and email address) so that we can communicate with each other in our capacities as landlord and tenant or seller and purchaser; and
- financial information (such as the bank account information, tax registration information and billing details for your business) so that we can manage payments which you need to make to us.

Personal information we collect and use if you are an insurance claimant in relation to one of our properties or during your former employment by Harworth or one of the former UK Coal companies

Where you make a claim against us in relation to something which has happened on one of our properties or your during former employment by a Harworth entity or one of the former UK Coal companies, we may collect:

- basic identification and contact information (such as your name, address, telephone number, and email address); and
- details of your claim, which could include information about your health, physical condition and/or financial losses you say you have suffered,

in each case so that we can ask our insurers to respond to your claim.

Personal information we collect and use if we buy land from you or we enter into a planning promotion agreement with you

Where we buy land from you or enter into a planning promotion agreement with you, we may collect:

- basic identification and contact information (such as your name, address, telephone number, and email address) so that we can communicate with each other as seller and purchaser or counterparties to the agreement; and
- information about the property you own, to help us assess whether we want to enter into a contract with you and, once we have entered into a contract, to perform our obligations under it.

Personal information we collect and use if you ask us to give you updates on the progress we are making on development of a particular site

Occasionally, when we buy a new site in which there is significant local interest, we may provide updates to local stakeholders about the progress we are making on development at the site. In those instances, we will only provide updates to people who ask for them. In those circumstances we may collect your basic identification and contact information (such as your name, address and email address) and the nature of your interest in the site (a local resident or councilor, for example).

The legal basis for using your personal information

We will only collect, use and share your personal information where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- you have provided your consent to us using the personal information;

- our use of your personal information is in our legitimate interest as a commercial organisation, for example (i) where you make a claim against us which we refer to our insurers or (ii) where we want to monitor the use of our website or (iii) where we are promoting a sight for planning permission - in these cases we will look after your information at all times in a way that is proportionate and respects your privacy rights and you have a right to object to processing as explained in the Your Legal Rights section below;
- our use of your personal information is necessary to perform a contract or take steps to enter into a contract with you, for example (i) where we are assessing your suitability to provide services to, or carry out works for, us or (ii) where you occupy a home on one of our development sites and our management company is contractually obliged to maintain the site in return for payment by you of a service charge; and/or
- our use of your personal information is necessary to comply with a relevant legal or regulatory obligation that we have, for example (i) where we are required to communicate with you as a shareholder or (ii) where we are required to disclose personal information to a court, tax authority or other regulatory body, such as the Health and Safety Executive or the Environment Agency.

If you would like to find out more about the legal basis for which we process personal information please [contact us](#).

[Click here](#) for a table summarising the information we collect and process, why we collect and process that information and our legal basis for doing so.

SHARING PERSONAL INFORMATION WITHIN HARWORTH, WITH OUR SERVICE PROVIDERS AND OUR REGULATORS

In this section you can find out more about how we share personal information:

- within Harworth
- with third parties that help us provide our products and services; and
- our regulators

We share your information in the manner and for the purposes described below:

- i. within Harworth, where such disclosure is necessary to manage our business. [Click here](#) for a list of Harworth affiliates;
- ii. with third parties who help manage our business and deliver services. These third parties have agreed to confidentiality restrictions and use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us. These include IT service providers who help manage our IT systems, our managing agents, our insurers and insurance brokers, our consultants, our registrars and our auditors;
- iii. we may share information with our regulators, such as the Information Commissioner's Office, the Health and Safety Executive, the Environment Agency and the Forestry Commission, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies; and
- iv. if, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose information to a potential or actual third party purchaser of our business or assets.

EXPLAINING MORE ABOUT DIRECT MARKETING, PROFILING

In this section you can find out more about when and how we undertake profiling and analytics

When and how we undertake profiling and analytics

Cookies are small text files that are stored on the device you are using to access a website. Almost all websites use cookies as a way of improving visitor experience on the site.

Cookies help websites perform a number of important tasks, such as letting you navigate between pages easily and efficiently, remembering your preferences on the website and generally improving your experience with the site. Harworth uses Google Analytics on its websites to track visitor information which is used to measure site activity and assist in recommending changes to the website to improve customer experience. Google Analytics uses cookies to collect the following data:

- your IP address;
- the name of the browser you are using or any other website that referred you to our website;
- the date and time of your visit;
- the duration of visit; and
- the pages viewed during your visit.

We may use this data to measure site activity, to generate statistics and to improve the information provided by our website.

If you want to change the preferences for cookies on your device, you will be able to do this through your browser settings. The Help function within your browser should tell you how. For general information about cookies go to <http://www.allaboutcookies.org/>

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy notice applicable to the website in question.

TRANSFERRING PERSONAL INFORMATION GLOBALLY

In this section you can find out more about the arrangements we have in place to protect your personal information if the third parties with whom we share your information transfer it overseas.

Harworth itself does not transfer personal information outside of the EU.

Harworth will take appropriate steps to ensure that transfers of personal information outside of the EU, by third parties with whom we share information (see the [Sharing Personal Information Within Harworth, With Our Service Providers And Our Regulators](#) section above) are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights. Where we transfer your personal information to third parties, we obtain contractual commitments from them to protect your personal information. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of personal information transferred from within the EU to the United States.

Where we receive requests for information from law enforcement or regulators, we will carefully validate these requests before any personal information is disclosed.

You have a right to [contact us](#) for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

HOW WE PROTECT AND STORE YOUR INFORMATION

Security

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss of personal data, or the unauthorised disclosure or access to such information, appropriate to the nature of the information concerned.

Measures we take include: (i) placing confidentiality requirements on our employees and the third parties with whom we share personal information; (ii) reviewing regularly the personal information we hold and destroying or permanently anonymising personal information if it is no longer needed for the purposes for which it was collected; (iii) testing and improving the resilience of our cyber security and IT controls and (iv) providing training to our employees on the importance of personal data protection.

Storing your personal information

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice. In some circumstances we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, and/or accounting requirements.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. Click on the links below to learn more about each right you may have:

- [To access personal information](#)
- [To rectify / erase personal information](#)
- [To restrict the processing of your personal information](#)
- [To transfer your personal information](#)
- [To object to the processing of personal information](#)
- [To object to how we use your personal information for direct marketing purposes](#)
- [To obtain a copy of personal information safeguards used for transfers outside your jurisdiction](#)
- [To lodge a complaint with your local supervisory authority](#)

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by [contacting us](#). Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of: (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see [right to object](#)); or
- it has been processed unlawfully; or
- to comply with a legal obligation to which Harworth is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims;

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your [local supervisory authority](#) if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

CONTACT US

The primary point of contact for all issues arising from this privacy notice, is our Group General Counsel and Company Secretary, Chris Birch. We can be contacted in the following ways:

enquire@harworthgroup.com

0114 349 3131

Harworth Group
Advantage House
Poplar Way
Catcliffe
Rotherham
S60 5TR

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to contact us first. We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

To contact your data protection supervisory authority

You have a right to lodge a complaint with your local [data protection supervisory authority](#) (i.e. your place of habitual residence, place or work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority.

Summary of personal information we collect and process, what we use that information for and our legal basis for doing so

Categories of individual	Type of information collected	Purpose	Legal basis
Website users	Browser type, operating system, IP address, domain name, number of times you visited the website, dates you visited the website, and the amount of time you spent viewing the website	To monitor the use of our website	Legitimate interest
Occupants of houses on our development sites	Basic identification and contact information	To fulfil the contractual obligations owed by one of our management companies	Performance of a contract
	Financial information	To manage and process service charge payments by you	Performance of a contract
	Information about the house you occupy on our development site	To inform the decisions we make about public open space and our planning obligations at the site	Legitimate interest and legal obligation
Professional advisers	Basic identification and contact information	To communicate with you during the course of your engagement	Performance of a contract
	Financial information	To pay for your services	Performance of a contract
	Information about your	To assess your suitability to undertake	Entry into a contract

	business	works for us	
Contractors and consultants	Basic identification and contact information	To communicate with you during the course of your engagement	Performance of a contract
	Financial information	To pay for your services	Performance of a contract
	Information about your business	To assess your suitability to undertake works for us	Entry into a contract
Shareholders	Basic identification and contact information and details of shareholding	To include you in communications to all of our shareholders	Legal or regulatory obligation
	Financial information	To pay dividends to you	Legal or regulatory obligation
Occupiers of commercial units on our development sites	Basic identification and contact information	To communicate with you pursuant to the terms of our agreement with you	Performance of a contract
	Financial information	To manage payments you need to make to us	Performance of a contract
Insurance claimant	Basic identification and contact information	To respond to your claim	Legitimate interest
	Details of your claim	To respond to your claim	Legitimate interest
Sellers and counterparties to planning promotion agreements	Basic identification and contact information	To communicate with you pursuant to the terms of our agreement with you	Performance of a contract
	Information about the	To help us assess whether we want to	Entry into, and performance of, a

	property you own	enter into a contract with you and, once we have entered into a contract, to perform our obligations under it	contract
Individuals who ask us to give them updates on the progress we are making on development of a particular site	Basic identification and contact information and nature of interest in site	To keep local stakeholders up to date on progress as part of our planning promotion strategy for the site	Legitimate interest

Harworth affiliates

Harworth Group plc
Harworth Estates Property Group Limited
Coalfield Estates Limited
Harworth Guarantee Co. Limited
Harworth Secretariat Services Limited
Harworth Trustees Limited
Harworth Estates Group Limited
Harworth No.3 Limited
Harworth Services Limited
Harworth Regeneration Limited
Harworth Estates Limited
Harworth Estates (Waverley Prince) Limited
Harworth Estates Mines Property Limited
Harworth Estates Overage Limited
Harworth Estates Curtilage Limited
Harworth Estates Investments Limited
Harworth Estates (Agricultural Land) Limited
Harworth Estates No.2 Limited
EOS Inc. Limited
Harworth Estates Warwickshire Limited
Harworth TRR Limited
Mapplewell Management Company Limited
Waverley Community Management Company Limited
Flass Lane Management Company Limited
Logistics North MC Limited
POW Management Company Limited
Rossington Community Management Company Limited
Simpson Park Management Company Limited
Harworth Surface Water Management (North West) Limited
The Aire Valley Land LLP
Bates Regeneration Limited
Waverley Square Limited
Multiply Logistics North Holdings Limited
Multiply Logistics North LP