

Website Privacy Notice

Identity and Contact Details of Data Controller

According to the relevant data protection law, your personal data will be processed by:

Ardstone Homes Limited,
48 Fitzwilliam Square West,
Dublin 2,
D02 EF89
TEL: (01) 614 1400
dataprotection@ardstone.com

Personal Data Collected by Ardstone¹

Ardstone collects the following personal data related to the operation of its website:

- **Identification Data:** Name, surname, e-mail address, telephone number, home address, date of birth.
- **Traffic Data:** Log data, IP address.

Purposes of the Processing and Legal Basis

Your personal data will be processed for the following purposes and in accordance with the legal basis as set out below:

Purpose	Legal basis
Manage website	Legitimate interest of Ardstone to improve its website
Investor login function	Performance of contract
Registration of Interest	Legitimate interest of Storyhouse to select appropriate applications to take up tenancy in property

Profiling or Automated Decision Making

Not applicable – Ardstone does not process personal data for the purpose of profiling, e.g., for marketing. Similarly, Ardstone does not collect personal data for use in any form of automated decision making.

¹ This notice also applies to the following companies within the Ardstone group:

- Ardstone Capital Limited
- Ardstone Fund Management Limited
- Ardstone Inversiones Sociedad Limitada
- Ardstone Capital Limited
- Storyhouse Properties Limited

Indirect Collection of Data

Your personal data may also have been indirectly collected from different sources:

Categories of personal data indirectly collected	Non-Publicly accessible source
Identification data	Cookies and web analytics service
Traffic data	

Categories of Recipients of Personal Data

Your personal data will be shared with the following recipients:

- Within the Ardstone Group, authorised personnel in charge of commercial activities.
- With service providers, acting on our behalf and assisting us in the management of our activities such as Outsourced website developers or IT service providers.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, tax, accounting, reporting or contractual requirements. 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 requirements.

When personal data is no longer needed or has reached its retention period it is deleted.

Personal data might be kept for a longer period of time where it is necessary in accordance with legal requirements.

Transfer of Personal Data

Due to the international dimension of Ardstone, your personal data may be transferred outside of the European Economic Area ('EEA') to countries recognised by the European Commission as ensuring an adequate level of protection on the basis of an adequacy decision such as the United Kingdom where Ardstone operates.

Your personal data may be also transferred to countries whose level of protection of personal data has not been deemed adequate by the European Commission.

According to the data protection regulation, to ensure an appropriate level of protection to your personal data transferred to those countries, Ardstone puts in place relevant safeguards such as the signature of data transfer agreement based on the standard contractual clauses ('SCCs') issued by the European Commission.

Data Subjects Rights

In relation to your personal data, you have the following rights:

- **Right to object:** You can object to our 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 basis. Please contact us, providing details of your objection.
- **Access to your personal data:** You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. In compliance with the GDPR, we will respond to a valid subject access request without undue delay and at the latest within one month of receiving the request. In some circumstances, we can extend the time to respond by a further two months. For example, when the request is complex.

In this case, we will let you know within one month of receiving your access request and explain to you why the extension is necessary.

- **Consent:** Most of the time, we won't need your consent to use your personal data as we will be using it only to fulfil our obligations and exercise our rights as an employer. There are limited circumstances where we may ask for your consent to process your information. Where you have given us your consent to use personal data, you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- **Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. Please be aware that we may have legal obligations to retain employee records for a certain period after your employment.
- **Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless (i) you have given us your consent (ii) it is necessary for a contract between you and us, or (iii) is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out automated decision-making in connection with your employment, but we will notify you in advance if this changes.

Exercising your rights

These rights can be exercised by sending an e-mail at the following address: dataprotection@ardstone.com

Contact details of the Data Protection Officer

If you have any comments or questions regarding this Privacy Notice or our data handling practices, please contact the Data Privacy Manager.

Email: dataprotection@ardstone.com

Right to Complain to the Data Protection Commission

You have the right to lodge a complaint with the Data Protection Commission (DPC) via their website www.dataprotection.ie if you think that Ardstone has not processed your personal data in accordance with data protection legislation.