

Gleeson Land Privacy Notice

Effective From

15 July 2021

This privacy notice describes how Gleeson Land Limited (company registration number 05181745) and other members of our group of companies (which we will refer to as "Gleeson", "us" or "we") collect, process, use and protect personal information. Gleeson is committed to respecting the privacy of its customers, suppliers, agents, and other stakeholders. We take data protection very seriously and comply with all relevant legislation when handling any personal information given or received from you or third parties.

This privacy notice applies to all personal information that you, or a third party, provides to us. By providing Gleeson (or our authorised third parties) with information or using our website you agree to be bound by this notice in respect of the personal information collected about you.

This notice may change from time to time, so please check it regularly.

This is the personal information we collect

In the course of our interactions with you we may collect some or all of the following information:

- Your name
- Your email address
- Your telephone number
- Your address
- Your bank account details
- Your opinions pertaining to Gleeson's business
- Insurance certificates

We do not collect any special category data.

This is how we collect your personal information

- From the information provided directly to us, or through third party agents
- From the information you provide by our agents
- When you view our website
- When you register for alerts or other products and / or services through our website

This is why we collect and how we use your personal information

- To register you as a customer, supplier, agent or other stakeholder
- To carry out our due diligence obligations

- To provide services pertaining to Gleeson's land business
- Contacting you with information about Gleeson's land business or business opportunities
- Administering your instructions
- Administering payments
- To comply with legal or other regulatory requirements
- To support marketing campaigns

The legal basis we rely on to process your personal information

Under Data Protection legislation we are allowed to process your personal information if we meet certain conditions. The reasons for processing that we rely on are as follows:

1. In the performance of a contract
We need to process your personal information when it is necessary to perform a contract, such as an option agreement.
2. In the performance of our legal obligations
Where we are required to do so by law, we will disclose your personal information, for example, where your personal information is requested by a law enforcement agency.
3. Where we have a legitimate interest to in doing so
Where we consider that the use of your personal information is necessary to achieve a legitimate interest of Gleeson, and only if we've balanced Gleeson's interest against your interests, rights and freedoms. Many of the reasons that we collect your personal information will fall under this category.
4. With your consent
Generally, we do not rely on consent as a legal basis for processing your personal information although we will get your consent before sending third party direct marketing communications to you, or as otherwise set out in this privacy notice. You have the right to withdraw consent to marketing at any time by contacting us.

Who we share your personal information with

We do not share your information outside of Gleeson, except with selected third parties that work on our behalf, to provide you with a product or service that is relevant to you. These companies are required to ensure appropriate security measures are in place and maintain the confidentiality of your information. These third parties can include but are not limited to: our service providers (including our solicitors or other professional advisors), or agents and our regulators (including the Financial Conduct Authority, the London Stock Exchange, HM Revenue and Customs and the Information Commissioner's Office).

Sometimes your personal information may be sent to other parties outside of the United Kingdom (UK) and the European Economic Area (EEA) in connection with the purposes set out above. We will take all reasonable steps to ensure that your personal information is treated securely and in accordance with this Privacy Notice, and in doing so may rely on certain "transfer mechanisms" such as the standard

contractual clauses approved by the European Commission. If you would like further information, please contact us.

How long we will hold your personal information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your Rights

Under Data Protection legislation you have a number of rights. These include:

- The right to know how we use and handle your personal information
- The right to access the personal information that we are handling and to information contained within this privacy notice
- The right to anonymise your personal information, or for us to correct any mistakes in the information we hold
- The right at any time to object to direct marketing or for you to be removed from our databases or mailing lists
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

If you have any questions or complaints relating to how we use your personal information, or if you wish to exercise any of your rights regarding your personal information, please write to us at the following address and enclose appropriate identification in order that we may confirm your identity:

Company Secretary
MJ Gleeson PLC
6 Europa Court
Sheffield Business Park
Sheffield
S9 1XE

Information Commissioner's Office

You may contact the Information Commissioner's office to log a complaint either via their website: ico.org.uk or by calling 0303 123 1113.

Changes to this Privacy Notice

We regularly review our privacy notice and reserve the right to make changes at any time without notice.

15 July 2021

