

#### **Privacy Policy**

#### 1. Who We Are

This Privacy Policy applies to Oxfordshire Living Developments Ltd ("OLD-Homes", "we", "our", "us"), a property investment and development company based in Oxfordshire. It also applies to any connected special purpose vehicles (SPVs), affiliates, or project companies under our operational control.

Registered Address: 3 Cocklebarrow Farm Cocklebarrow, Aldsworth, Cheltenham,

England, GL54 3PU

Company Number: 15880238

Data Controller Contact: will@old-homes.co.uk

We are committed to protecting your privacy and ensuring your data is handled securely and lawfully.

2. What Information We Collect

We may collect and process the following types of personal data:

Identity Data: Full name, title, date of birth

Contact Data: Email address, phone number, mailing address

Financial Data: Investment amounts, bank account details (where applicable)

Technical Data: IP address, browser type, device, cookies

Usage Data: Page interactions, form submissions, investor preferences

Marketing Data: Your communication preferences and interaction history

We do not collect any special category (sensitive) data unless explicitly provided and with your consent.

3. How We Collect Your Data

We collect personal data via:

Direct interactions (e.g. enquiry forms, investor onboarding, email)

Automated technologies (e.g. website cookies)

Third-party services (e.g. marketing platforms, referral partners)

4. How We Use Your Data

Your data may be used to:



Respond to your enquiries or investment interest

Provide updates on current or future investment opportunities

Carry out due diligence, AML, or KYC checks (where applicable)

Send newsletters, project announcements, or marketing materials

Comply with legal, financial, and regulatory obligations

Improve our website and user experience

We only process your data where we have a lawful basis — such as your consent, a contract, legal obligation, or our legitimate business interests.

5. Sharing Your Data

We may share your data with:

Professional advisers (e.g. solicitors, accountants)

Regulatory or government authorities (e.g. HMRC, FCA, Companies House)

Joint venture partners or SPVs in which you express an investment interest

Service providers for marketing, compliance, or technical support

We never sell your personal data.

6. International Transfers

We do not routinely transfer your personal data outside the UK or EEA. Where this is necessary (e.g. for cloud service providers), we ensure appropriate safeguards such as Standard Contractual Clauses are in place.

7. Data Retention

We retain your data only as long as necessary to fulfil the purposes we collected it for, including legal and financial record-keeping.

Typical retention periods:

Enquiry/contact data: 2 year

Investor records: 6+ years post-investment

Marketing preferences: Until you withdraw consent



# 8. Your Rights

Under UK GDPR, you have the right to:

Access the personal data we hold about you

Correct inaccurate or incomplete data

Request deletion of your data (in certain cases)

Object to or restrict processing

Withdraw consent at any time

Lodge a complaint with the Information Commissioner's Office (ICO)

To exercise your rights, contact: will@old-homes.co.uk

# 9. Data Security

We implement appropriate security measures (e.g. encryption, access controls) to protect your data from unauthorised access, alteration, or loss.

## 10. Cookies

Our website uses cookies to enhance your browsing experience and collect anonymous analytics. You can manage your cookie preferences via your browser settings.

## 11. Updates to This Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website. Material changes will be communicated directly if appropriate.



If you have questions about this policy or your data, please contact:

will@old-homes.co.uk